

EXHIBIT 3

Docket Report

Case Description

Case ID: 170300712
Case Caption: B. ETAL VS ROOSEVELT INN LLC ETAL
Filing Date: Friday , March 10th, 2017
Location: CH - City Hall
Case Type: 20 - PERSONAL INJURY - OTHER
Status: CLDBR - DEFERRED - BANKRUPTCY

Related Cases

No related cases were found.

22-JAN-2018 02:33 PM	ANCOM - ANSWER TO COMPLAINT FILED	WAGNER, THOMAS P	22-JAN-2018 02:59 PM
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Documents: [MB - Answer to Complaint with New Matter and Crossclaim.PDF](#)

Docket Entry: ANSWER WITH NEW MATTER AND CROSSCLAIM TO PLAINTIFF'S AMENDED COMPLAINT FILED. (FILED ON BEHALF OF ALPHA-CENTURION SECURITY, INC.)

02-FEB-2018 12:12 PM	RPCCL - REPLY TO CROSSCLAIM	OBERDICK JR., DANIEL E	02-FEB-2018 12:43 PM
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Documents: [Roosevelt - Answer to Alpha Centurion Crossclaims.pdf](#)

Docket Entry: REPLY TO CROSSCLAIM OF ALPHA-CENTURION SECURITY, INC. FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

05-FEB-2018 04:59 PM	RPNMT - REPLY TO NEW MATTER	NOCHO, KYLE B	06-FEB-2018 09:23 AM
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Documents: [Minor-Plaintiff M.B. Reply to NM of Defendant Alpha-Centurion Security, Inc.pdf](#)

Docket Entry: REPLY TO NEW MATTER OF ALPHA-CENTURION SECURITY, INC. FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

16-APR-2018 08:15 PM	OBJCT - OBJECTIONS FILED	NOCHO, KYLE B	17-APR-2018 08:42 AM
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Documents: [Objections to Subpoenas.pdf](#)
[Ex. A to Pltfs Objections to Subpoena.pdf](#)

Docket Entry: OBJECTIONS TO SUBPOENA PURSUANT TO RULE 4009.21 FILED. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

20-APR-2018 10:53 AM	CERTI - CERTIFICATION FILED	OBERDICK JR., DANIEL E	20-APR-2018 11:06 AM
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Documents: [Certification Prerequisite - Redacted.pdf](#)
[Certificate Prerequisite.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

20-APR-2018 03:10 PM	CERTI - CERTIFICATION FILED	OBERDICK JR., DANIEL E	20-APR-2018 03:23 PM
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Documents: [Certification Prerequisite REDACTED.pdf](#)
[Certification Prerequisit UNREDACTED.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

01-MAY-2018 11:56 AM	CERTI - CERTIFICATION FILED	OBERDICK JR., DANIEL E	01-MAY-2018 12:15 PM
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Documents: [Certificate Prerequisite to Serve Subpoena Redacted.pdf](#)
[Certificate Prerequisite to Serve Subpoena Unredacted.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

07-MAY-2018 05:36 PM	DSCIM - DISCOVERY MOTION FILED	OBERDICK JR., DANIEL E	08-MAY-2018 09:06 AM
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Documents: [Roosevelt - Mtn to Overrule Objections to SBs.pdf](#)
[Unredacted Exhibit A Notice of Intent.pdf](#)
[Roosevelt - Pls Objections to SB - Ex. B.pdf](#)
[Roosevelt - Mtn to Overrule Objections to SBs.pdf](#)
[Roosevelt - SB to Family - Ex. A.pdf](#)
[Roosevelt - Pls Objections to SB - Ex. B.pdf](#)
[Confidential Document Form](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO OVERRULE OBJECTIONS. HEARING SCHEDULED FOR: MAY 22, 2018 AT 09:00 IN ROOM 625 CITY HALL. (FILED ON BEHALF OF ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY LLC AND YAGNA PATEL)

23-MAY-2018 09:00 AM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	ROBINS-NEW, SHELLEY	23-MAY-2018 12:00 AM
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Documents: [ORDER 59.pdf](#)

Docket Entry: AND NOW, THIS 22ND DAY OF MAY, 2018 UPON CONSIDERATION OF DEFENDANTS ROOSEVELT INN LCC D/B/A ROOSEVELT INN AND ROOSEVELT INN CAFE', ROOSEVELT MOTOR INN, INC. D/B/A ROOSEVELT MOTOR INN, UFVS MANAGEMENT COMPANY, LLC AND YAGNA PATEL'S MOTION TO OVERRULE MINOR PLAINTIFF M.B.'S OBJECTIONS TO SUBPOENA, AND ANY RESPONSE THERETO, IT IS HEREBY ORDERED THAT MINOR PLAINTIFF M.B.'S OBJECTIONS ARE OVERRULED. IT IS FURTHER ORDERED THAT DEFENDANTS MAY SERVE THE PROPOSED SUBPOENAS ON MINOR PLAINTIFF M.B.'S MOTHER, FATHER AND BROTHER.. BY THE COURT: ROBINS-NEW,J. 5/23/18

30-MAY-2018 04:31 PM DSCIM - DISCOVERY MOTION FILED OBERDICK JR., DANIEL E 31-MAY-2018 07:29 AM

Documents: [Moton to Enforce JJPI Subpoena.pdf](#)
[Roosevelt - Ex. A Mtn to Enforce JJPI SB \(Redacted\).pdf](#)
[Roosevelt - Ex. B \(Mtn to Enforce JJPI SB\) Redacted.pdf](#)
[Roosevelt - Ex A Mtn to Enforce JJPI SB \(unredacted\).pdf](#)
[Roosevelt - Ex. B \(Mtn to Enforce JJPI SB\) Unredacted.pdf](#)
[Moton to Enforce JJPI Subpoena.pdf](#)
[Roosevelt - Ex A Mtn to Enforce JJPI SB \(unredacted\).pdf](#)
[Roosevelt - Ex. B \(Mtn to Enforce JJPI SB\) Unredacted.pdf](#)
[Confidential Document Form](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO ENFORCE SUBPOENA. HEARING SCHEDULED FOR: JUNE 12, 2018 AT 09:00 IN ROOM 625 CITY HALL. (FILED ON BEHALF OF ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY LLC AND YAGNA PATEL)

04-JUN-2018 12:14 PM DSCIM - DISCOVERY MOTION FILED NOCHO, KYLE B 04-JUN-2018 12:27 PM

Documents: [\(36\) MTC STOP response to Subpoena.pdf](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL COMPLIANCE WITH SUBPOENA. HEARING SCHEDULED FOR: JUNE 19, 2018 AT 09:00 IN ROOM 625 CITY HALL. (FILED ON BEHALF OF M. B. AND WILLIAM A. CALANDRA ESQ)

04-JUN-2018 12:52 PM DSCIM - DISCOVERY MOTION FILED NOCHO, KYLE B 04-JUN-2018 12:52 PM

Documents: [\(37\) MTC Vision Quest Response to Subpoena.pdf](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL COMPLIANCE WITH SUBPOENA. HEARING SCHEDULED FOR: JUNE 19, 2018 AT 09:00 IN ROOM 625 CITY HALL. (FILED ON BEHALF OF M. B. AND WILLIAM A. CALANDRA ESQ)

04-JUN-2018 01:18 PM DSCIM - DISCOVERY MOTION FILED NOCHO, KYLE B 04-JUN-2018 02:14 PM

Documents: [\(38\) MTC New Directions response to Subpoena.pdf](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL COMPLIANCE WITH SUBPOENA. HEARING SCHEDULED FOR: JUNE 19, 2018 AT 09:00 IN ROOM 625 CITY HALL. (FILED ON BEHALF OF M. B. AND WILLIAM A. CALANDRA ESQ)

08-JUN-2018 04:02 PM DSCIM - DISCOVERY MOTION FILED NOCHO, KYLE B 11-JUN-2018 07:39 AM

Documents: [MTC Villa response to Subpoena.pdf](#)

Docket Entry: DISCOVERY HEARING REQUEST FILED IN RE: MOTION TO COMPEL COMPLIANCE WITH SUBPOENA. HEARING SCHEDULED FOR: JUNE 26, 2018 AT 09:00 IN ROOM 625 CITY HALL. (FILED ON BEHALF OF M. B. AND WILLIAM A. CALANDRA ESQ)

08-JUN-2018 CERTI - CERTIFICATION FILED
04:37 PM

OBERDICK JR.,
DANIEL E

08-JUN-2018
04:41 PM

Documents: [Cert Prereq Redacted.pdf](#)
[Cert Prereq Unredacted.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF YAGNA PATEL, UFVS MANAGEMENT COMPANY LLC, ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC)

13-JUN-2018 ORDER - ORDER ENTERED/236
09:58 AM NOTICE GIVEN

ROBINS-NEW,
SHELLEY

13-JUN-2018
12:00 AM

Documents: [ORDER_67.pdf](#)

Docket Entry: IT IS HEREBY ORDERED THAT SAID MOTION IS GRANTED. THE JOSEPH J. PETERS INSTITUTE IS HEREBY COMMANDED TO PRODUCE THE DOCUMENTS REQUESTED BY SUBPOENA, AT THE OFFICES OF DEFENDANTS' COUNSEL, BLANK, ROME LLP, ONE LOGAN SQUARE, PHILADELPHIA, PA, WITHIN (20) DAYS OF THE DATE OF THIS ORDER, OR APPROPRIATE SANCTIONS SHALL BE IMPOSED UPON THE JOSEPH J. PETERS INSTITUTE UPON APPLICATION TO THE COURT.....BY THE COURT: ROBINS-NEW, J. 06/12/2018.

19-JUN-2018 ORDER - ORDER ENTERED/236
02:41 PM NOTICE GIVEN

BUTCHART, ANN

19-JUN-2018
12:00 AM

Documents: [ORDER_69.pdf](#)

Docket Entry: AND NOW, THIS 19TH DAY OF JUNE,2018, UPON CONSIDERATION OF MINOR-PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA DIRECTED TO VISIONQUEST AND ANY RESPONSE THERETO, IT IS HEREBY;ORDERED AND DECREED THAT MINOR-PLAINTIFF'S MOTION IS GRANTED AND VISIONQUEST SHALL PRODUCE ALL DOCUMENTS IN ITS POSSESSION THAT ARE RESPONSIVE TO MINOR-PLAINTIFF'S SUBPOENA WITHIN 20 DAYS OF THE DATE OF THIS ORDER. FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN SANCTIONS UPON APPLICATION TO THE COURT.....BY THE COURT: BUTCHART,J. 6/19/2018

19-JUN-2018 ORDER - ORDER ENTERED/236
03:00 PM NOTICE GIVEN

BUTCHART, ANN

19-JUN-2018
12:00 AM

Documents: [ORDER_70.pdf](#)

Docket Entry: AND NOW,THIS 19TH DAY OF JUNE,2018, UPON CONSIDERATION OF MINOR-PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA DIRECTED TO NEW DIRECTIONS TREATMENT SERVICES AND ANY RESPONSE THERETO, IT IS HEREBY;ORDERED AND DECREED THAT MINOR-PLAINTIFF'S MOTION IS GRANTED AND NEW DIRECTIONS TREATMENT SERVICES SHALL PRODUCE ALL DOCUMENTS IN ITS POSSESSION THAT ARE RESPONSIVE TO MINOR-PLAINTIFF'S SUBPOENA WITHIN 20 DAYS OF THE DATE OF THIS ORDER. FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN SANCTIONS UPON APPLICATION TO THE COURT.....BY THE COURT: BUTCHART,J. 6/19/2018

19-JUN-2018 03:09 PM	ORDER - ORDER ENTERED/236 NOTICE GIVEN	BUTCHART, ANN	19-JUN-2018 12:00 AM
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Documents: [ORDER_72.pdf](#)

Docket Entry: AND NOW, THIS 19TH DAY OF JUNE,2018, UPON CONSIDERATION OF MINOR-PLAINTIFF'S MOTION TO COMPEL COMPLIANCE WITH SUBPOENA DIRECTED TO SOBRIETY THROUGH OUTPATIENT PHILADELPHIA AND ANY RESPONSE THERETO, IT IS HEREBY; ORDERED AND DECREED THAT MINOR-PLAINTIFF'S MOTION IS GRANTED AND SOBRIETY THROUGH OUTPATIENT PHILADELPHIA SHALL PRODUCE ALL DOCUMENTS IN ITS POSSESSION THAT ARE RESPONSIVE TO MINOR-PLAINTIFF'S SUBPOENA WITHIN 20 DAYS OF THE DATE OF THIS ORDER. FAILURE TO COMPLY WITH THIS ORDER MAY RESULT IN SANCTIONS UPON APPLICATION TO THE COURT.....BY THE COURT: BUTCHART,J. 6/19/2018

20-JUL-2018 03:05 PM	CERTI - CERTIFICATION FILED	23-JUL-2018 09:10 AM
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Documents: [CCLR 18-09322JF.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF ALPHA-CENTURION SECURITY, INC., ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC) (FILED BY CENTER CITY LEGAL REPRODUCTIONS, INC.)

20-JUL-2018 04:20 PM	CERTI - CERTIFICATION FILED	23-JUL-2018 09:39 AM
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Documents: [CCLR 18-09371JF.pdf](#)

Docket Entry: CERTIFICATE PREREQUISITE TO SERVICE OF SUBPOENAS PURSUANT TO RULE 4009.22 FILED. (FILED ON BEHALF OF ALPHA-CENTURION SECURITY, INC., ROOSEVELT MOTOR INN, INC. AND ROOSEVELT INN LLC) (FILED BY CENTER CITY LEGAL REPRODUCTIONS, INC.)

25-JUL-2018 04:12 PM	MTEXR - MOT-FOR EXTRAORDINARY RELIEF	MARKS, EMILY B	25-JUL-2018 04:13 PM
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Documents: [Motion for Extraordinary Relief.pdf](#)
[Motion CoverSheet Form](#)

Docket Entry: 74-18073174 RESPONSE DATE 08/06/2018. (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

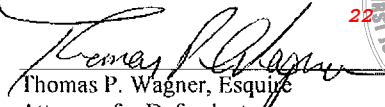
27-JUL-2018 12:17 PM	MTMIS - MISCELLANEOUS MOTION/PETITION	MARKS, EMILY B	27-JUL-2018 02:37 PM
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Documents: [Motion for Leave to File Second Amended Complaint.pdf](#)
[Motion CoverSheet Form](#)

Docket Entry: 33-18073433 RESPONSE DATE 08/16/2018. PLAINTIFF'S MOTION FOR LEAVE TO FILE A SECOND AMENDED COMPLAINT (FILED ON BEHALF OF WILLIAM A. CALANDRA AND M. B.)

TO PLAINTIFF AND CO-DEFENDANTS:
YOU ARE HEREBY REQUIRED TO RESPOND TO
THE ENCLOSED NEW MATTER AND CROSS-
CLAIMS WITHIN 20 DAYS OR A JUDGMENT MAY
BE ENTERED AGAINST YOU.

Filed and Attested by the
Office of Judicial Records
22 JAN 2018 02:33 pm
A. SILIGRINI


Thomas P. Wagner, Esquire
Attorney for Defendant,
Alpha-Centurion Security, Inc. (incorrectly named as
Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: Thomas P. Wagner, Esquire

Identification No.: 27145

BY: Robert W. Stanko, Esquire

Identification No. 208830

BY: Melanie J. Foreman, Esquire

Identification No.: 317951

2000 Market Street, Suite 2300

Philadelphia PA 19103

(215) 575-2600

Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc. d/b/a
Alpha Century Security, Inc.)

M.B. minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

Plaintiff

v.

ROOSEVELT INN LLC d/b/a ROOSEVELT
INN and ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN and
UFVS MANAGEMENT COMPANY, LLC
and YAGNA PATEL and ALPHA-
CENTURION SECURITY, INC. d/b/a ALPHA
CENTURY SECURITY, INC.

Defendants

: PHILADELPHIA COUNTY
: COURT OF COMMON PLEAS

:
: MARCH TERM, 2017

:
: NO. 00712

:
: JURY TRIAL DEMANDED

ANSWER OF DEFENDANT, ALPHA-CENTURION SECURITY, INC.
(INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC. d/b/a ALPHA
CENTURY SECURITY, INC.), TO PLAINTIFF'S AMENDED COMPLAINT WITH
NEW MATTER AND CROSS-CLAIMS

Defendant, Alpha-Centurion Security, Inc. (incorrectly named as Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc.) (hereinafter referred to as "Answering Defendant"), by and through its attorneys, Marshall Dennehey Warner Coleman & Goggin, hereby files its Answer with New Matter and New Matter Cross-Claims to Plaintiff's Amended Complaint as follows:

1. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial. Answering Defendant does not dispute that human sex trafficking exists, but Answering Defendant has no involvement in any such activity, and Answering Defendant has no knowledge of any such activity occurring at the Roosevelt Inn as alleged in Plaintiff's Complaint. It is specifically denied that any act or omission on the part of Answering Defendant in any way caused or contributed to the alleged human sex trafficking outlined in Plaintiff's Complaint.

2. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial. Answering Defendant does not dispute that human sex trafficking exists, but Answering Defendant has not involvement in any such activity, and Answering Defendant has no actual or constructive knowledge of any such activity occurring at the Roosevelt Inn as alleged in Plaintiff's Complaint.

3. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, after reasonable investigation, Answering Defendant is without knowledge or

information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial. Pennsylvania's human trafficking law is a writing that speaks for itself, and Plaintiff's characterization thereof is denied.

4. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

5. Admitted in part and denied in part. It is admitted only that minor-Plaintiff's name and address do not appear in the Amended Complaint. As to the remainder of the allegations, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

6. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

7. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of

the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

8. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

9. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

10. Denied. It is specifically denied that Answering Defendant is or ever was doing business as Alpha Century Security, Inc. It is specifically denied that Answering Defendant provided security services at the Roosevelt Inn at all times material to the allegations contained in Plaintiff's Amended Complaint. Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a copy of which is attached hereto as Exhibit A.

11. Admitted in part and denied in part. It is admitted only that Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a

copy of which is attached hereto as Exhibit A. The contract is a writing that speaks for itself and Plaintiff's characterization thereof is specifically denied.

12. Admitted in part and denied in part. It is admitted only that Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a copy of which is attached hereto as Exhibit A. The contract is a writing that speaks for itself and Plaintiff's characterization thereof is specifically denied. The remaining averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the averments are denied and strict proof thereof is demanded at trial.

13. Admitted in part and denied in part. It is admitted only that Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a copy of which is attached hereto as Exhibit A. The contract is a writing that speaks for itself and Plaintiff's characterization thereof is specifically denied. The remaining averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the averments are denied and strict proof thereof is demanded at trial.

14. Admitted to the extent the corresponding paragraph is directed to Answering Defendant. To the extent the allegations in the corresponding paragraph are directed to parties other than Answering Defendant, after reasonable investigation Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

15. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a

response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

16. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, it is specifically denied that Answering Defendant is liable for any acts and/or omissions on the part of Answering Defendant and/or its actual or apparent agents, servants and/or employees.

17. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

18. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, the corresponding allegations are denied and strict proof thereof is demanded at trial.

19. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

20. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, it is specifically denied that any acts and/or omissions on the part of Answering Defendant and/or its actual or

apparent agents, servants and/or employees had any knowledge of human sex trafficking at the Roosevelt Inn or in any way caused or permitted human sex trafficking to occur at the Roosevelt Inn.

21. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

22. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, it is specifically denied that Answering Defendant and/or its actual or apparent agents, servants and/or employees had any knowledge of human sex trafficking at the Roosevelt Inn or in any way failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

23. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

24. Denied. The allegations contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, it is specifically denied that Answering Defendant had knowledge of any alleged commercial sex

acts on the premises of the Roosevelt Inn, and/or that Answering Defendant received money or financially profited therefrom.

25. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. 18 Pa.C.S.A. § 3001, *et seq.* is a writing that speaks for itself and Plaintiff's characterization thereof is specifically denied.

26. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

27. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

28. Admitted only that Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, the content of which speaks for itself and Plaintiff's characterization thereof is specifically denied. See Ex. A.

29. Denied. Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, the content of which speaks for itself and Plaintiff's characterization thereof is specifically denied. See Ex. A.

30. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, Answering

Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a copy of which is attached hereto as Exhibit A. The contract speaks for itself and Plaintiff's characterization thereof is specifically denied.

31. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a copy of which is attached hereto as Exhibit A. The contract speaks for itself and Plaintiff's characterization thereof is specifically denied.

32. Denied. The corresponding allegations are denied as conclusions of law to which no response is necessary. To the extent further response is deemed required, Answering Defendant provided certain services at certain times in the past to the Roosevelt Inn pursuant to a contract, a copy of which is attached hereto as Exhibit A. The contract speaks for itself and Plaintiff's characterization thereof is specifically denied.

33. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, the corresponding allegations are denied and strict proof thereof is demanded at trial.

34. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant knowingly benefitted financially from any alleged commercial sex acts and/or human trafficking at the Roosevelt Inn. The remaining averments contained in the corresponding paragraph are also denied and strict proof thereof is demanded at trial.

35. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

36. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the corresponding allegations are denied. It is specifically denied that Answering Defendant, individually and/or by and through its actual or apparent agents, servants and/or employees, had knowledge, constructive knowledge and/or general awareness that rooms and services were being rented or otherwise provided to individuals trafficking minor-Plaintiff for commercial sex acts.

37. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

38. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the corresponding allegations are denied. It is specifically denied that Answering Defendant, individually and/or by and through its actual or apparent agents, servants and/or employees, had

knowledge, constructive knowledge and/or general awareness that minor-Plaintiff was being sexually exploited.

39. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

40. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

41. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

42. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

43. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

44. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

45. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

46. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

47. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

48. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

49. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of

the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

50. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

51. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

52. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

53. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

54. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

55. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

56. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

57. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

58. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

59. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

60. Denied. After reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of

the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

61. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

62. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

63. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the corresponding allegations are denied. It is specifically denied that Answering Defendant, individually and/or by and through its actual or apparent agents, servants and/or employees, had knowledge, constructive knowledge and/or general awareness of any alleged signs of human trafficking. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

64. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a

response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

65. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further response is deemed required, it is specifically denied that Answering Defendant had knowledge of any alleged commercial sex acts on the premises of the Roosevelt Inn, and/or that Answering Defendant received money or financially profited therefrom.

66. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

67. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the corresponding allegations are denied and strict proof thereof is demanded at trial. It is specifically denied that Answering Defendant individually and/or by its actual or apparent agents, servants, and/or employees, was negligent at any time relevant to minor-Plaintiff's allegations.

68. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a

response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

69. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, it is specifically denied that Answering Defendant individually and/or by its actual or apparent agents, servants, and/or employees, was negligent at any time relevant to minor-Plaintiff's allegations. It is specifically denied that Answering Defendant had knowledge of any alleged commercial sex acts on the premises of the Roosevelt Inn, and/or that Answering Defendant received money or financially profited therefrom. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

70. Denied. The allegations contained in the corresponding paragraph are directed to parties other than Answering Defendant, and therefore no response is necessary. To the extent a response is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

71. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, it is specifically denied that Answering Defendant individually and/or by its actual or apparent agents, servants, and/or employees, acted outrageously and/or in reckless disregard for the health

and welfare of minor-Plaintiff. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

COUNT I – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

72. Answering Defendant incorporates its Answers to paragraphs 1 through 71 above as if same were set forth fully at length herein.

73. - 77. The allegations contained in paragraphs 73 through 77 are addressed to parties other than Answering Defendant, and therefore no response is required. To the extent further answer is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

**COUNT II – NEGLIGENCE: VIOLATION OF PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 Pa. C.S.A. § 3001, et. seq.**

**M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY,
INC. (INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC.
D/B/A ALPHA CENTURY SECURITY, INC.)**

78. Answering Defendant incorporates its Answers to paragraphs 1 through 77 above as if same were set forth fully at length herein.

79. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. 18 Pa.C.S.A. § 3001, *et seq.* is a writing that speaks for itself and Plaintiff's characterization thereof is specifically denied.

80. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, the corresponding allegations are denied and strict proof thereof is demanded at trial.

81. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that any acts or omissions on the part of Answering Defendant and/or its actual or apparent agents, servants and/or employees in any way caused or contributed to Plaintiff's alleged injuries, and/or that any acts or omissions on the part of Answering Defendant and/or its actual or apparent agents, servants and/or employees in any way caused or permitted human sex trafficking to occur at the Roosevelt Inn.

82. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is deemed required, the corresponding allegations are denied. It is specifically denied that Answering Defendant, individually and/or by and through its actual or apparent agents, servants and/or employees, had knowledge, constructive knowledge and/or general awareness of any alleged signs of human

trafficking. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

83. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that any acts and/or omissions on the part of Answering Defendant and/or its actual or apparent agents, servants and/or employees in any way caused or permitted human sex trafficking to occur at the Roosevelt Inn.

84. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that any acts or omissions on the part of Answering Defendant and/or its actual or apparent agents, servants and/or employees in any way caused or contributed to Plaintiff's alleged injuries, and/or that any acts or omissions on the part of Answering Defendant and/or its actual or apparent agents, servants and/or employees in any way caused or permitted human sex trafficking to occur at the Roosevelt Inn.

85. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant individually and/or by its actual or apparent agents, servants, and/or employees had knowledge of any alleged commercial sex acts on the premises of the Roosevelt Inn, and/or that Answering Defendant received money or financially profited therefrom. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

86. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed

required, it is specifically denied that Answering Defendant, individually, and/or by and through its actual or apparent agents, servants and employees, acted outrageously and/or in reckless disregard for the health and welfare of minor-Plaintiff. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

87. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, the allegations are denied and strict proof thereof is demanded at trial.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

COUNT III – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

88. Answering Defendant incorporates its Answers to paragraphs 1 through 87 above as if same were set forth fully at length herein.

89. - 92. The allegations contained in paragraphs 89 through 92 are addressed to parties other than Answering Defendant, and therefore no response is required. To the extent further answer is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to

Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

COUNT IV – NEGLIGENCE

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC. (INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC. D/B/A ALPHA CENTURY SECURITY, INC.)

93. Answering Defendant incorporates its Answers to paragraphs 1 through 92 above as if same were set forth fully at length herein

94. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, the corresponding allegations are denied and strict proof thereof is demanded at trial.

95. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant, individually and/or by and through its actual or apparent agents, servants and/or employees, had knowledge, constructive knowledge and/or general awareness of any alleged signs of human trafficking. The remainder of the corresponding allegations are also denied and strict proof thereof is demanded at trial.

96. Denied. The averments contained in the corresponding paragraph and subparagraphs (a) through (x) are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant, individually and/or by and through its actual or apparent agents, officers, servants and/or employees, was negligent at any time relevant to minor-Plaintiff's allegations set forth in the Amended Complaint. The remainder of the allegations in the corresponding

paragraph and subparagraphs (a) through (x) are also denied and strict proof thereof is demanded at trial.

97. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant was negligent at any time relevant to minor-Plaintiff's allegations set forth in the Amended Complaint. As to the remainder of the corresponding allegations, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of these allegations and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

98. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant was negligent at any time relevant to minor-Plaintiff's allegations set forth in the Amended Complaint. It is specifically denied that Answering Defendant had knowledge of any alleged commercial sex acts on the premises of the Roosevelt Inn, and/or that Answering Defendant received money or financially profited therefrom.

99. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that any acts or omissions on the part of Answering Defendant in any way caused or contributed to minor-Plaintiff's alleged injuries.

100. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant was negligent at any time relevant to

minor-Plaintiff's allegations set forth in the Amended Complaint. It is specifically denied that any acts or omissions on the part of Answering Defendant in any way caused or contributed to minor-Plaintiff's alleged injuries.

101. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant acted outrageously and/or in reckless disregard for the health and welfare of minor-Plaintiff.

102. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, the allegations are denied.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

COUNT V – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

103. Answering Defendant incorporates its Answers to paragraphs 1 through 102 above as if same were set forth fully at length herein.

104. - 105. The allegations contained in paragraphs 104 through 105 are addressed to parties other than Answering Defendant, and therefore no response is required. To the extent further answer is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the

allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

COUNT VI – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC. (INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC. D/B/A ALPHA CENTURY SECURITY, INC.)

106. Answering Defendant incorporates its Answers to paragraphs 1 through 105 above as if same were set forth fully at length herein.

107. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant was negligent at any time relevant to minor-Plaintiff's allegations. It is specifically denied that any acts or omissions on the part of Answering Defendant in any way caused or contributed to minor-Plaintiff's alleged injuries.

108. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant acted outrageously and/or in reckless disregard for the health and welfare of minor-Plaintiff.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to

Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

COUNT VII – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

109. Answering Defendant incorporates its Answers to paragraphs 1 through 108 above as if same were set forth fully at length herein.

110. - 111. The allegations contained in paragraphs 110 through 111 are addressed to parties other than Answering Defendant, and therefore no response is required. To the extent further answer is deemed required, after reasonable investigation, Answering Defendant is without knowledge or information sufficient to form a belief as to the truth or falsity of the allegations of the corresponding paragraph and, therefore, the allegations are denied and strict proof thereof is demanded at trial.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

COUNT VIII – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B., A MINOR, BY HER GUARDIAN v. ALPHA-CENTURION SECURITY, INC. (INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC. D/B/A ALPHA CENTURY SECURITY, INC.)

112. Answering Defendant incorporates its Answers to paragraphs 1 through 111 above as if same were set forth fully at length herein.

113. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed

required, it is specifically denied that any acts or omissions on the part of Answering Defendant in any way caused or contributed to Plaintiff's alleged injuries, and/or that any acts or omissions on the part of Answering Defendant in any way caused or permitted human sex trafficking to occur at the Roosevelt Inn.

114. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that any acts or omissions on the part of Answering Defendant in any way caused or contributed to minor-Plaintiff's alleged injuries, and/or that Answering Defendant had knowledge of any alleged commercial sex acts on the premises of the Roosevelt Inn.

115. Denied. The averments contained in the corresponding paragraph are conclusions of law to which no responsive pleading is required. To the extent further answer is deemed required, it is specifically denied that Answering Defendant acted outrageously and/or in reckless disregard for the health and welfare of minor-Plaintiff.

WHEREFORE, Answering Defendant respectfully requests that this Honorable Court dismiss Plaintiff's Amended Complaint with prejudice and award attorneys' costs and fees to Answering Defendant. Answering Defendant also requests further relief as may be appropriate under the circumstances.

NEW MATTER

116. Answering Defendant incorporates its Answers to paragraphs 1 through 115 above as if same were set forth fully at length herein, and asserts the following New Matter:

117. Minor-Plaintiff has failed to state a cause of action upon which relief can be granted.

118. Minor-Plaintiff's claims are or may be barred by the statute of limitations.

119. The sole and proximate cause of the alleged incident involved in this case, and any injury, damage or loss allegedly sustained by minor-Plaintiff, if any, was the result of the act, conduct, negligence, recklessness, carelessness, breaches of contract, violation of statute, code regulation or standard, and violation of duties and obligations owed by persons or parties other than Answering Defendant or its agents, servants, workers or employees.

120. Answering Defendant breached no duty to minor-Plaintiff.

121. The property described in Plaintiff's Amended Complaint was owned, possessed, and/or controlled by an entity other than Answering Defendant over whom Answering Defendant had no control or right of control.

122. The injuries and damages allegedly sustained by minor-Plaintiff were caused by an intervening cause and/or superseding cause and, therefore, minor-Plaintiff may not recover against Answering Defendant.

123. Minor-Plaintiff's claims are barred, limited, or reduced by virtue of the fact that Answering Defendant cannot be held liable for the criminal acts of third parties.

124. If it is determined that Answering Defendant is liable along with any other Defendant or Third Party Defendant, Answering Defendant's respective liabilities shall be determined in accordance with the provisions of 42 Pa. C.S.A. § 7102.

125. Answering Defendant denies that it proximately caused each and every time of injury and/or damages set forth in Plaintiff's Amended Complaint.

126. Answering Defendant at all relevant times acted lawfully, prudently and reasonably and in the exercise of good faith.

127. The conduct attributed to Answering Defendant, which has been denied, did not cause or contribute to the injuries and damages in the Amended Complaint, and the injuries and damages described in the Amended Complaint were not foreseeable to Answering Defendant.

128. Answering Defendant had no notice, actual or constructive, of criminal activity of the kind allegedly perpetrated against minor-Plaintiff.

129. Answering Defendant's alleged conduct was not the legal cause of any harm to minor-Plaintiff.

130. No conduct, action, inaction, or omissions on the part of Answering Defendant caused or contributed to minor-Plaintiff's injuries or damages, if any.

131. Answering Defendant was not negligent, careless and/or reckless at any time relevant to minor-Plaintiff's allegations.

132. Any acts or omissions of Answering Defendant were not substantial causes of and did not result in the injury and/or damages set forth in Plaintiff's Amended Complaint.

133. Minor-Plaintiff fails to state a claim under Pennsylvania's Human Trafficking Law, 18 Pa.C.S.A. § 3001, *et seq.*

134. Answering Defendant raises all defenses and immunities available under Pennsylvania's Human Trafficking Law, 18 Pa.C.S.A. § 3001, *et seq.*

135. Answering Defendant denies that it had knowledge, constructive knowledge and/or general awareness that minor-Plaintiff, if proven, was being sexually exploited and/or subjected to involuntary servitude.

136. Answering Defendant denies that it knowingly benefitted financially from the commercial sex acts and/or or involuntary servitude, if any, committed at the Roosevelt Inn.

137. Answering Defendant denies that it knowingly marketed or provided its services to any other Defendant or Third Party Defendant that recruited, profited from or maintained minor-Plaintiff in any sex trade act and/or involuntary servitude.

138. Answering Defendant denies that it supervised or exercised control, or had right of control over any other Defendant or Third Party Defendant that recruited, profited from or maintained minor-Plaintiff in any sex trade act and/or involuntary servitude.

139. The treble damages and punitive damages provisions of Pennsylvania's Human Trafficking Law, 18 Pa.C.S.A. § 3001, *et seq.* violate the Pennsylvania Constitution and the United States Constitution.

140. Any award of punitive damages would be unjustified under the facts of this case, and would also violate the Pennsylvania Constitution and the United State Constitution.

WHEREFORE, Answering Defendant demands judgment in its favor and against all Plaintiff together with attorneys' fees, costs, interest and for such other relief as the Court may deem just and proper.

NEW MATTER CROSS-CLAIM PURSUANT TO PA.R.C.P. 1031.1

ALPHA-CENTURION SECURITY, INC. (INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC. D/B/A ALPHA CENTURY SECURITY, INC.) v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

141. Answering Defendant incorporates its Answers to paragraphs 1 through 115 above as if same were set forth fully at length herein, and asserts the following Cross-Claims:

142. Answering Defendant specifically denies that it bears any liability to minor-Plaintiff for the allegations and circumstances set forth in Plaintiff's Amended Complaint. If minor-Plaintiff sustained injuries and damages as alleged, which allegations are herein expressly denied, then said injuries and damages were caused by the actions, omissions, negligence,

carelessness and/or recklessness, and other liability producing conduct on the part of the other named Co-Defendants in this action, Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, and were caused in no manner whatsoever by Answering Defendant.

143. In preservation of its prior denials of Plaintiff's Amended Complaint, Answering Defendant avers that if minor-Plaintiff receives, by verdict, settlement, or otherwise, any payment related to this matter, then the other named Co-Defendants in this action, Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, are alone liable to minor-Plaintiff and/or primarily liable over to Answering Defendant by way of contribution and common law indemnification, together with interest, costs, and attorneys' fees.

WHEREFORE, Answering Defendant demands judgment in its favor and against all other parties together with attorneys' fees, costs, interest and for such other relief as the Court may deem just and proper.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

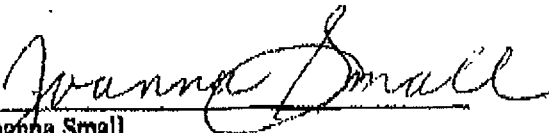
BY: 

Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)

Dated: 1/22/18

VERIFICATION

Joanna Small, being duly sworn according to law, deposes and verifies that the statements made in the foregoing Answer of Defendant, Alpha-Centurion Security, Inc. (incorrectly named as Alpha-Centurion Security, Inc. d/b/a Alpha Century Security, Inc.), to Plaintiff's Amended Complaint are true to the best of her knowledge, information, and belief. The undersigned understands that the statements therein are made subject to the penalties of 18 Pa. Cons. Stat. § 4904 relating to unsworn falsification to authorities.


Joanna Small

Date: 1/17/18

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: Thomas P. Wagner, Esquire

Identification No.: 27145

BY: Robert W. Stanko, Esquire

Identification No. 208830

BY: Melanie J. Foreman, Esquire

Identification No.: 317951

2000 Market Street, Suite 2300

Philadelphia PA 19103

(215) 575-2600

Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc. d/b/a
Alpha Century Security, Inc.)

M.B. minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

v.

ROOSEVELT INN LLC d/b/a ROOSEVELT
INN and ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN and
UFVS MANAGEMENT COMPANY, LLC
and YAGNA PATEL and ALPHA-
CENTURION SECURITY, INC. d/b/a ALPHA-
CENTURY SECURITY, INC.

: PHILADELPHIA COUNTY
: COURT OF COMMON PLEAS

: MARCH TERM, 2017

: NO. 00712

: JURY TRIAL DEMANDED

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: 

Thomas P. Wagner, Esquire

Robert W. Stanko, Esquire

Melanie J. Foreman, Esquire

Attorneys for Defendant,

Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)

Dated: 1/22/18

CERTIFICATE OF SERVICE

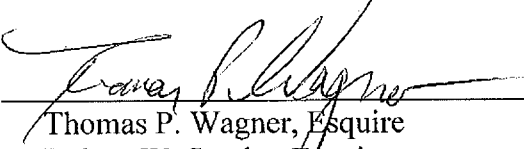
I, Thomas P. Wagner, hereby certify that a true and correct copy of the Answer of Defendant, Alpha-Centurion Security, Inc. (incorrectly named as Alpha-Centurion Security, Inc.), to Plaintiff's Amended Complaint was served by electronic filing to all parties listed below on the date set forth below:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19101
Attorneys for minor-Plaintiff

Grant S. Palmer, Esquire
James J. Quinlan, Esquire
Justina L. Byers, Esquire
Daniel E. Oberdick, Esquire
Blank Rome, LLP
130 North 18th Street
Philadelphia, PA 19103
*Attorneys for Roosevelt Inn LLC d/b/a
Roosevelt Inn and Roosevelt Inn Café,
Roosevelt Motor Inn, Inc. d/b/a Roosevelt
Motor Inn, UFVS Management Company,
LLC and Yagna Patel*

**MARSHALL DENNEHEY WARNER
COLEMAN & GOGGIN**

BY: _____


Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Attorneys for Defendant,
Alpha-Centurion Security, Inc. (incorrectly
named as Alpha-Centurion Security, Inc.
d/b/a Alpha Century Security, Inc.)

Dated: _____

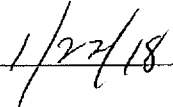


EXHIBIT "A"



Joanna Small,
President
WBDCPA-0257

Alpha-Centurion Security, Inc.



200 - 204 West Chester Pike
Havertown, PA 19083
Phone: (610) 449-7840
Fax: (610) 449-2010

SECURITY CONTRACT

This contract made this 1st day of March, 2007 by and between Alpha-Centurion Security, Inc. herein referred to as Service to Roosevelt Inn herein referred to as Client.

1. Service will furnish uniformed security officers to assist in the safeguard of Clients property and person located at 7600 Roosevelt Blvd., Philadelphia, PA 19152. Both parties will agree upon the number of Security Officers and the Specific Duties of the Officers. The Security Officers will be employees of the service, which will pay all payroll taxes. Service will at all times be an independent contractor and not an agent of the Client.
2. Client will compensate the Service at the rate of: UN-Armed \$13.25 Armed _____. Holidays - Client will be billed time and one half for seven paid holidays when security officers are required to work on the specified days as follows: (1) Christmas Day- (2) New Years Day- (3) Easter - (4) 4th of July - (5) Memorial Day - (6) Labor Day - (7) Thanksgiving Day.

Court - Client will be billed straight time for time spent in court on the Clients behalf.

Emergency or Special Service, which for the purpose of this contract, is defined as Additional Security Service, requested less than Seventy -Two Hours prior to the required time. Client will assume all Overtime cost associated with emergency or special services.

Service will assume all overtime costs associated to maintain normal, agreed upon staffing levels.

3. Payment will be made within 14 of receipt of Invoice. If payment is not received 21 days after agreement date, service will be automatically suspended until payment is received. Client will not offset any claim against billing. After 21 payment is considered late and subject to 1 1/2% interest, 18% annually.
4. Invoiced hours will be considered accepted as Accurate and Payable if not contested in writing within 14 Days of receiving invoice.
5. Termination - This agreement may be terminated prior to its expiration date in the event either party shall default in the performance of its obligations under this proposal and subsequent agreement (including the timely payments of amounts due under it), and the non-defaulting party shall have the right, in addition to such other rights the party may have under this agreement by giving three days written notice by certified mail to the defaulting party. In the event of default resulting in termination of the agreement, if either party brings action against the other to enforce any condition or covenant of this Agreement, the prevailing party in such action shall be entitled to recover the court costs, and reasonable attorney fees.



Joanna Small,
President
WBXC-PA-0257

Alpha-Centurion Security, Inc.



200 - 204 West Chester Pike
Havertown, PA 19083
Phone: (610) 449-7840
Fax: (610) 449-2010

6. Upon termination of this agreement, all security officers will be removed from the premises, and all responsibilities of Service to perform services, and Client to pay for future services will be ended. Client will also ensure that all equipment, records, forms, papers belonging to the service will be released to the service.
7. Service is an equal opportunity employer which does not discriminate in hiring, promotion or any condition of employment on the basis of race, color, creed, sex, age, marital status, or natural origin, and complies with all pertinent federal, state, and local laws and regulations. Unarmed Security Officers by law are not allowed to carry Batons, handcuffs, unless they are PA 235 Certified.
8. Service does not guarantee that its service will prevent loss, theft, or damage to Client's property or injury to persons. Service is not an insurer and the amount the Client is paying for Security Guard Service bears no relationship to the value of the property of the Client or others, which Service is helping to safeguard. Service will not be responsible for any loss, theft or damages to property unless solely caused by the negligence of Service's security officers performing their assigned duties and then only to the amount considered replacement value, under no circumstances will Service pay retail for replacement, and any cost not to exceed the insurance provided. Service shall be responsible for and indemnify Client for any loss, theft, or damage to property or injury to persons caused solely or in part as a result of intentional or deliberate acts, conduct, omissions and or criminal activities of Service's security officers when committed in the performance of their duties. Service and Client each waive any right of subrogation against each other for losses due to fire, explosion or other insured against peril.
9. Service will carry comprehensive general liability insurance, issued by insurance companies licensed to do business in the Commonwealth of Pennsylvania and state of New Jersey with a minimum limit of \$1,000,000.00 and \$2,000,000.00 Aggregate, workers' compensation insurance covering its employees while working at Client's locations. Client shall be furnished with a certificate of insurance. Client will be added as additionally insured.
10. If Service and Client are unable to perform this agreement because of strikes or labor difficulties of any nature involving employees of Service, Client or third parties, or because of Acts of God such as fire, flood, or national emergency, or due to any other cause beyond Service's and Client's control. The Service and Client shall be relieved of any claims, liability, or obligation under this agreement.
11. This agreement is for a term of As Needed. Either party may terminate at the expiration of this term by giving the other Thirty (30) Days written notice of intention to do prior to the then current term. If no notice is given, then this agreement will continue on a Month to Month Basis.
12. If during any term of the agreement Service's labor costs are increased, Service may notify Client who agrees to renegotiate Service's Billing Rate. If no agreement can be reached, then either party may terminate this agreement (10) Ten Days after giving the other written notice by certified or registered mail of its intention to do so at the end of the contract.



Joanna Small,
President
WBDCPA-0257

Alpha-Centurion Security, Inc.

200 - 204 West Chester Pike
Havertown, PA 19083
Phone: (610) 449-7840
Fax: (610) 449-2010



13. Client agrees to make available to Service at no charge any material or information and to include Service's personnel in any training programs necessary to comply with any applicable Federal or State "Right to Know" laws or regulations.
14. Client agrees that it will not solicit or make any offer of direct security related employment to any member of the Service's staff during current agreement or for a period of Twelve Months following the date of termination of this agreement.
15. The waiver by either party of a breach of violation of any provision of the Agreement shall not operate as, or be construed to be, a waiver of any subsequent breach of this agreement. In the event that any of the provisions or portions thereof, of this agreement are held to be unenforceable or invalid by any court or competent jurisdiction, the validity of enforceability of the remaining provisions or portions of it shall not be effected.

By: [Signature]
MARACCH

For: ROOSEVELT ZONE

Title: MARACCH

By: [Signature]
JOANNA SMALL

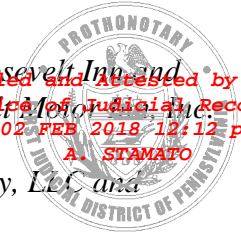
For: Alpha Centurion Security Inc.

Title: President

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
 Attorney Bar I.D. No.: 57686
 James J. Quinlan, Esquire
 Attorney Bar I.D. No.: 200944
 Justina L. Byers, Esquire
 Attorney Bar I.D. No.: 76773
 Daniel E. Oberdick, Esquire
 Attorney Bar I.D. No.: 309676
 One Logan Square
 130 North 18th Street
 Philadelphia, PA 19103-6998
 Tel.: (215) 569-5500
 Fax: (215) 569-5555
 Email: palmer@blankrome.com
 quinlan@blankrome.com
 byers@blankrome.com
 doberdick@blankrome.com

*Attorneys for Defendants,
 Roosevelt Inn LLC d/b/a Roosevelt Inn and
 Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
 d/b/a Roosevelt Motor Inn,
 UFVS Management Company, LLC and
 Yagna Patel*



M.B., minor by her Guardian,
 William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
 d/b/a ROOSEVELT INN and
 ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY
 CIVIL TRIAL DIVISION

MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S
 REPLY TO ALPHA-CENTURION SECURITY, INC.'S CROSSCLAIMS**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (“Answering Defendants”), by their undersigned counsel, hereby file this Reply to Defendant Alpha-Centurion Security, Inc.’s crossclaims as follows:

141. Denied. This is an incorporation paragraph to which no response is required. To the extent a response is required, Answering Defendants incorporate by reference their Answer to Plaintiff's Amended Complaint as if fully set forth herein.

142. Denied. It is specifically denied that Answering Defendants were negligent, careless and/or reckless at any time material hereto. By way of further response, the averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments are denied, and strict proof thereof is demanded at trial.

143. Denied. The averments contained in this paragraph are conclusions of law to which no responsive pleading is required. To the extent a response is required, the averments are denied, and strict proof thereof is demanded at trial.

WHEREFORE, Answering Defendants request judgment in their favor and against all parties together with attorneys' fees, costs, interest and any further relief deemed appropriate by this Court.

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: February 2, 2018

CERTIFICATE OF SERVICE

I, James J. Quinlan, Esquire, hereby certify that a true and correct copy of the foregoing Reply to Defendant Alpha-Centurion Security, Inc.'s Crossclaims was served this 2nd day of February, 2018, upon all counsel of record via the Court's E-Filing system and/or other electronic mail.

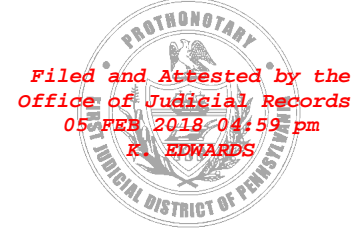
/s/ James J. Quinlan
JAMES J. QUINLAN

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Minor-Plaintiff



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

**MINOR-PLAINTIFF M.B.'S REPLY TO NEW MATTER OF
 DEFENDANT ALPHA-CENTURION SECURITY, INC.**

Minor-Plaintiff, by and through counsel, Kline & Specter, P.C., hereby replies to New Matter of Defendant Alpha-Centurion Security, Inc. as follows:

116. This is an incorporation paragraph to which no response is required.

117. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded.

118. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded.

119. Denied. This paragraph is a conclusion of law to which no response is required.

Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

120. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

121. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

122. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

123. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

124. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

125. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

126. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

127. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed

factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

128. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

129. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

130. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

131. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

132. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

133. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

134. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

135. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

136. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

137. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

138. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded. To the extent the allegations in this Paragraph are deemed factual in nature and a response is required, the allegations are denied. Strict proof is hereby demanded.

139. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

140. Denied. This paragraph is a conclusion of law to which no response is required. Strict proof is hereby demanded.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants and demands compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

NEW MATTER CROSSCLAIMS PURSUANT TO P.A.R.C.P. 1031.1

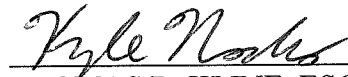
ALPHA-CENTURION SECURITY, INC. (INCORRECTLY NAMED AS ALPHA-CENTURION SECURITY, INC. D/B/A ALPHA CENTURY SECURITY, INC.) v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS MANAGEMENT COMPANY, LLC, YAGNA PATEL

141. This is an incorporation paragraph to which no response is required.

142. – 143. Paragraphs 142 through 143 are directed to a party other than Plaintiff, and no response is required.

WHEREFORE, Minor-Plaintiff M.B. demands judgment in her favor and against Defendants and demands compensatory damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE

Dated: February 5, 2018

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for the Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff M.B.'s Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

A handwritten signature in black ink, appearing to read "Kyle Nocho", is written over a horizontal line.

KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Dated: February 5, 2018

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 5th day of February, 2018, the foregoing Minor-Plaintiff's Reply to New Matter of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel was electronically filed and served

Upon acceptance electronically the below listed counsel; and:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103
President of Defendant Alpha-Centurion Security, Inc.

KLINE & SPECTER, P.C.

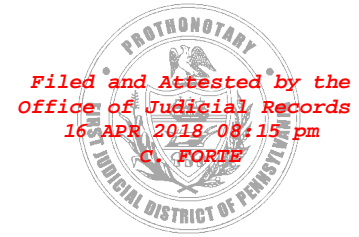
BY: 
KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

KLINE & SPECTER, P.C.

Attorneys for Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

OBJECTIONS TO SUBPOENA PURSUANT TO Pa.R.C.P. 4009.21

Plaintiff M.B, by her Guardian, William Calandra, Esq., by and through counsel, Kline & Specter, P.C., hereby objects to Defendants' proposed Subpoenas that are attached to these objections for the following reasons:

1. This lawsuit arises from injuries Plaintiff sustained as a victim of sex trafficking at Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC, and Yagna Patel's motel.

2. A Complaint in this matter was filed on March 10, 2017, and on September 5, 2017, Plaintiffs filed an Amended Complaint.

3. On March 27, 2018, the Roosevelt Inn Defendants issued a Notice of Intent to Serve a Subpoena.

4. Included among the proposed Subpoenas are three (3) proposed Subpoenas addressed to members of Plaintiff M.B.'s immediate family, including her mother, father and brother who are not parties to this lawsuit.

5. The three Subpoenas to which Plaintiff objects are addressed to M.B.'s father, R.B.; M.B.'s mother, K.B. and M.B.'s brother, A.P. See Riders to Defendants' Subpoenas to R.B., K.B. and A.P., attached as Exhibit "A".

6. Each of the Subpoenas directed to Plaintiff's mother, father and brother contains the identical language below:

Subject: M.B.

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.

7. The foregoing information sought from Plaintiff's immediate family members is beyond the scope of discovery, pursuant to Pa. R.C.P. 4011 which provides, in pertinent part:

Rule 4011: Limitation of scope of discovery:

No discovery, including discovery of electronically stored information, shall be permitted which:

(a) is sought in bad faith;

(b) would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent or any person or party;

...

(e) would require the making of an unreasonable investigation by the deponent or any party or witness.

8. Here, Defendants' proposed Subpoenas directed to Plaintiff's parents and brother are in violation of Rule 4011.

9. First, Plaintiff's parents and brother are not parties to this action.

10. Second, these Subpoenas to Plaintiff's immediate family would serve only to harass, annoy and cause a burden to Plaintiff's family.

11. Third, the Subpoenas are unclear, unreasonably vague and overbroad, and Plaintiffs object for this reason also.

12. Accordingly, Plaintiffs object to Defendants' proposed Subpoenas.

13. Pursuant to Pa. R.C.P. 4009.21(c), any party may object to the subpoena by filing of record written objections and serving a copy of the objections upon every other party to the action.

14. If objections are received by the party intending to serve the subpoena prior to its service, the subpoena shall not be served. Pa. R.C.P. 4009.21(d)(1).

15. For all the above reasons, Plaintiffs object to Defendants' proposed Subpoenas directed to Plaintiff's parents and brother, R.B., K.B. and A.P., attached as Exhibit "A".

WHEREFORE, Plaintiffs file this Objection in accordance with Pa. R.C.P. 4009.21.

Respectfully submitted,

KLINE & SPECTER, P.C.

BY: /s/ Kyle B. Nocho
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Plaintiffs

Date: 4/16/2018

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for the Plaintiffs in this matter and hereby verify that the statements made in the foregoing Plaintiffs' Objections to Subpoenas pursuant to Pa. R.C.P. 4009.21 are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

/s/ Kyle B. Nocho
KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiff

Dated: 4/16/2018

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of April, 2018, the foregoing Minor-Plaintiff's Plaintiffs' Objections to Subpoena pursuant to Pa. R.C.P. 4009.21 was electronically filed and served.

Upon acceptance electronically the below listed counsel; and:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103
President of Defendant Alpha-Centurion Security, Inc.

I do hereby certify that a true and correct copy of the above Plaintiffs' Objections to Subpoena pursuant to Pa.R.C.P. 4009.21 was served by facsimile on the following on the below date:

Litigation Solutions, LLC
Brentwood Towne Center
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227
Phone: 412-263-5656 Fax: 412-226-9106

KLINE & SPECTER, P.C.

/s/ Kyle B. Nocho
KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiff

Date 4/16/2018

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Calandra, Esquire

vs.

Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna Patel

Court of Common Pleas

March Term, 2017, No. 0712

Filed and Attested by the
Office of Judicial Records

16 SEP 2017 08:18 PM

C. FORTE

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR PRODUCTION TO
RULE 4009.21

Provider:

Record Type:

Warren G. Harding Middle School	Scholastic
Wordsworth Academy	Scholastic
Hazleton Elementary Middle School	Scholastic
George W. Sharswood Elementary School	Scholastic
Arthur Street Elementary School	Scholastic
A.P.	Miscellaneous
K.B.	Miscellaneous
R.B.	Miscellaneous
A Second Chance Inc. - Kinship Care	Medical
The Villa - Public Health Management Corporation	Medical
David Abel	Medical
Joseph J. Peters Institute	Medical
David Abel	Medical
The Bridge Therapeutic Center at Fox Chase	Medical
Lois Harrold	Medical
Lois Harrold	Medical
Y-HEP Health Center	Medical
Patricia H. Morgan MSN CRNP	Medical
Pennsylvania Hospital - Hall-Mercer Community Mental Health	Medical
Pepper George Middle School	Scholastic

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ("LSLLC") on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 10/06/2017

Litigation Solutions, LLC on behalf
of:

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Justina Byers Esquire
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. R.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

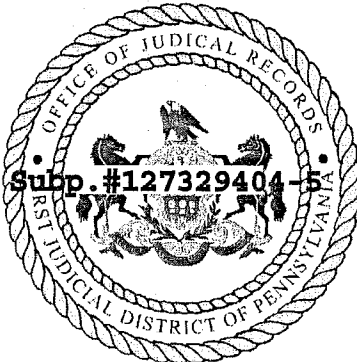
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

R.B.
[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: K.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

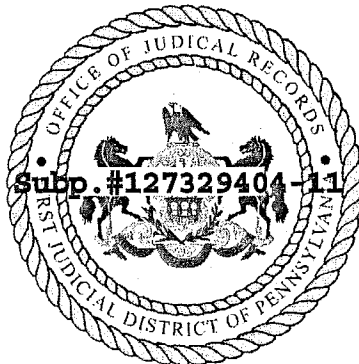
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

K.B.
[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A.P.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

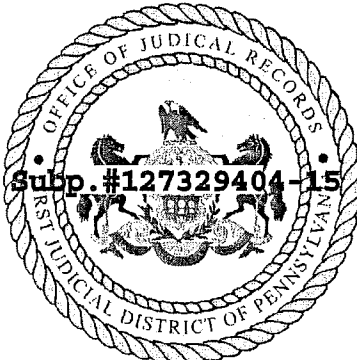
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A.P.

[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL

Court of Common Pleas

Filed and Attested by the
Office of Judicial Records
20 APR 2018 03:10 pm
K. EDWARDS

vs.

Roosevelt Inn LLC ETAL

Case Number: March Term, 2017, No. 0712

CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 04/20/2018

Litigation Solutions, LLC on behalf of

Daniel Oberdick

Attorney for the Defendant

CC:

Daniel Oberdick
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Daniel Oberdick _____

Signature: Litigation Solutions, LLC

Name: Litigation Solutions, LLC

Attorney No. (if applicable): _____

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

B. ETAL
vs.
Roosevelt Inn LLC ETAL

Court of Common Pleas

March Term, 2017, No. 0712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21**

Provider:	Record Type:
R.B.	Miscellaneous
Joseph J. Peters Institute	Medical
K.M.B.	Miscellaneous
J.P.	Miscellaneous

TO: Nadeem Bezar, Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ("LSLLC") on behalf of Daniel Oberdick intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 03/27/2018
CC: Daniel Oberdick of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf of:
Daniel Oberdick
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

COUNSEL LISTING FOR B. ETAL VS. ROOSEVELT INN LLC ETAL

County of Philadelphia Court of Common Pleas

Counsel	Firm	Counsel Type
Bezar, Esquire, Nadeem	1525 Locust Street Philadelphia, PA 19102 P: 215-772-1000 F: 215-772-1005	Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Joseph J. Peters Institute

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Daniel Oberdick, Esquire

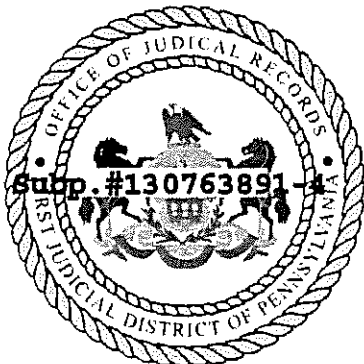
Date: March 27, 2018

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Joseph J. Peters Institute
1211 Chestnut Street 5th Floor
Philadelphia PA 19107

Subject: REDACTED

Requested Items:

Please Remit: Any and all records related to the subject above, including but not limited to: Service Records; Treatment Records; Handwritten Notes; E-Mail communication regarding same.

**COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA**

B. ETAL

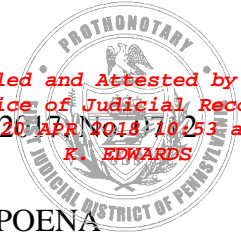
Court of Common Pleas

vs.

Roosevelt Inn LLC ETAL

Case Number: March Term, 2017-018-10253 am

*Filed and Attested by the
Office of Judicial Records
K. EDWARDS*



**CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 04/17/2018

Litigation Solutions, LLC on behalf of

Daniel Oberdick

Attorney for the Defendant

CC:

Daniel Oberdick
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Daniel Oberdick

Signature: 

Name: Litigation Solutions, LLC

Attorney No. (if applicable): _____

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

B. ETAL
vs.
Roosevelt Inn LLC ETAL

Court of Common Pleas
March Term, 2017, No. 0712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
 RULE 4009.21**

Provider:	Record Type:
A Second Chance, Inc. - Kinship Care	Medical
David Abel	Medical
Arthur Street Elementary School	Scholastic
Robert Beason	Miscellaneous
George W. Sharswood Elementary School	Scholastic
Lois Harrold	Medical
Joseph J. Peters Institute	Medical
Hazleton Elementary Middle School	Scholastic
Kelly Mahon Beason	Miscellaneous
Patricia H. Morgan, MSN, CRNP	Medical
Pennsylvania Hospital - Hall-Mercer Community Mental Health	Medical
Pepper George Middle School	Scholastic
Arthur Powell	Miscellaneous
The Bridge Therapeutic Center at Fox Chase	Medical
The Villa - Public Health Management Corporation	Medical
Warren G. Harding Middle School	Scholastic
Wordsworth Academy	Scholastic
Y-HEP Health Center	Medical

TO: Nadeem Bezar, Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Justina Byers, Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 03/14/2018

CC: Justina Byers, Esquire of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf of:

Justina Byers, Esquire
 Defense

If you have any questions regarding this matter, please contact:
 Litigation Solutions, LLC (412.263.5656)
 Brentwood Towne Centre
 101 Towne Square Way, Suite 251
 Pittsburgh, PA 15227

COUNSEL LISTING FOR B. ETAL VS. ROOSEVELT INN LLC ETAL

County of Philadelphia Court of Common Pleas

Counsel

Bezar, Esquire, Nadeem

Firm

1525 Locust Street
Philadelphia, PA 19102
P: 215-772-1000 F: 215-772-1005

Counsel Type

Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr David Abel
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

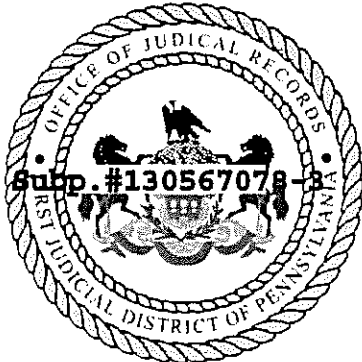
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Dr. David Abel
54 East Oakland Avenue
Doylestown PA 18901

Subject: REDACTED

Requested Items:

Please remit: Any and all medical records including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Arthur Street Elementary School

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

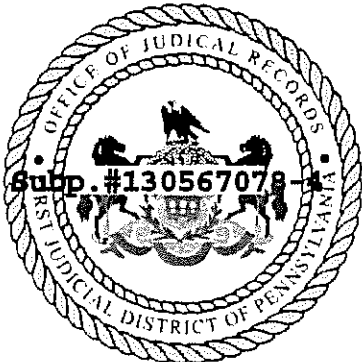
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Arthur Street Elementary School
424 E. 9th Street
Hazleton PA 18201

Subject: REDACTED

Requested Items:

Please Remit: Any and all records including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: George W. Sharswood Elementary School

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 14, 2018

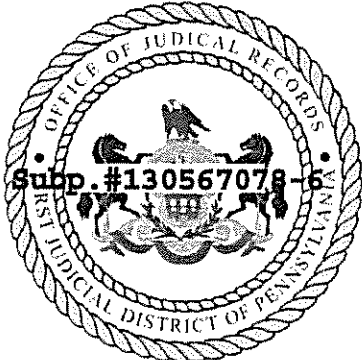
Name: Justina Byers, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCartSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

George W. Sharswood Elementary School
2300 S. Second Street
Philadelphia PA 19148

Subject: REDACTED

Requested Items:

Please Remit: Any and all records including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Lois Harold

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Justina Byers, Esquire

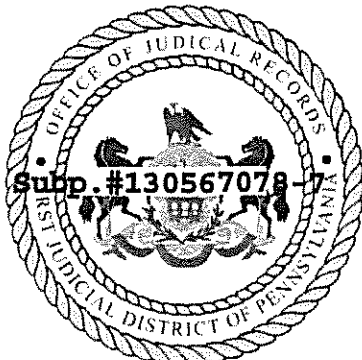
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:

Date: March 14, 2018



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

CRNP Lois Harrold
1109 DeKalb Street
Norristown PA 19401

Subject: REDACTED

Requested Items:

Please remit: Any and all medical records including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Hazleton Elementary Middle School
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

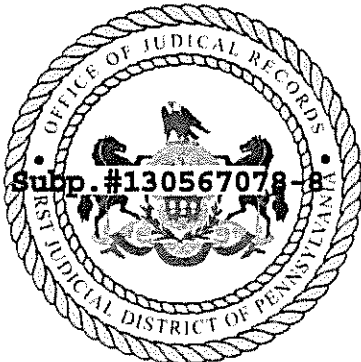
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Hazleton Elementary Middle School
700 N. Wyoming Street
Hazleton PA 18201

Subject: REDACTED

Requested Items:

Please remit: Any and all records including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Patricia H. Morgan, MSN, CRNP

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 14, 2018

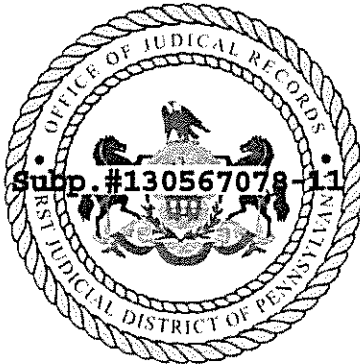
Name: Justina Byers, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Patricia H. Morgan, MSN, CRNP
1421 Highland Avenue
Abington PA 19001

Subject: REDACTED

Requested Items:

Please remit: Any and all medical records including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Pennsylvania Hospital - Hall-Mercer Community Ment
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

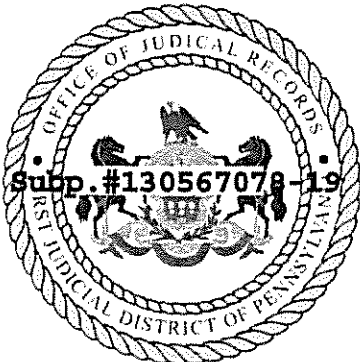
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Pennsylvania Hospital - Hall-Mercer Community Mental Health
245 S. 8th Street
Philadelphia PA 19106

Subject: REDACTED

Requested Items:

Please remit: Any and all medical records including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Pepper George Middle School

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 14, 2018

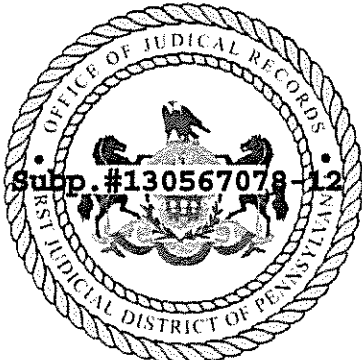
Name: Justina Byers, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Pepper George Middle School
2901 S. 84th Street
Philadelphia PA 19153

Subject: REDACTED

Requested Items:

Please Remit: Any and all records including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: The Bridge Therapeutic Center at Fox Chase
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

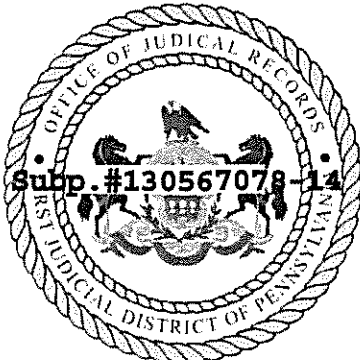
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

The Bridge Therapeutic Center at Fox Chase
1100 Adams Avenue
Philadelphia PA 19124

Subject: REDACTED

Requested Items:

Please remit: Any and all medical records including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: The Villa - Public Health Management Corporation
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

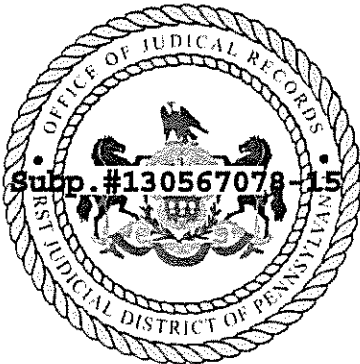
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

The Villa - Public Health Management Corporation
Centre Square East 1500 Market Street, Suite 1500
Philadelphia PA 19102

Subject: REDACTED

Requested Items:

Please remit: Any and all medical records including but not limited to treatment records.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Warren G. Harding Middle School
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

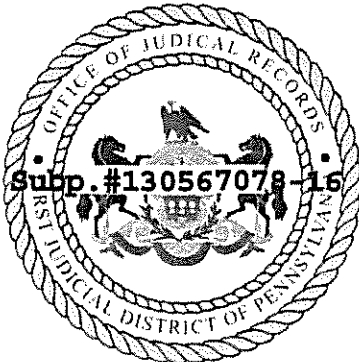
Date: March 14, 2018

Name: Justina Byers, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Warren G. Harding Middle School
2000 Wakeling Street
Philadelphia PA 19124

Subject: REDACTED

Requested Items:

Please Remit: Any and all records related to including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Wordsworth Academy

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 14, 2018

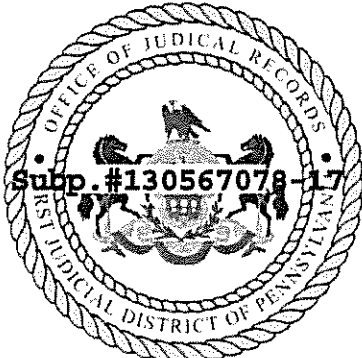
Name: Justina Byers, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Wordsworth Academy
2101 Pennsylvania Avenue
Fort Washington PA 19034

Subject: REDACTED

Requested Items:

Please Remit: Any and all records including but not limited to academic reports, attendance sheets, report cards, counseling documentation, teacher assessments, nursing records for her years of attendance at this school



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Y-HEP Health Center

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Justina Byers, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:

Date: March 14, 2018



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Y-HEP Health Center
1417 Locust Street 2nd Floor
Philadelphia PA 19102

Subject: REDACTED

Requested Items:

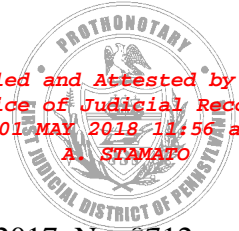
Please remit: Please remit: Any and all medical records including but not limited to treatment records.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL

Court of Common Pleas

Filed and Attested by the
Office of Judicial Records
01 MAY 2018 11:56 am
A. STAMATO



vs.

Roosevelt Inn LLC ETAL

Case Number: March Term, 2017, No. 0712

CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 04/27/2018

Litigation Solutions, LLC on behalf of

Daniel Oberdick

Attorney for the Defendant

CC:

Daniel Oberdick
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Daniel Oberdick

Signature: 

Name: Litigation Solutions, LLC

Attorney No. (if applicable): _____

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

B. ETAL
vs.
Roosevelt Inn LLC ETAL

Court of Common Pleas
March Term, 2017, No. 0712

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21

Provider:

Record Type:

A Second Chance, Inc. - Kinship Care

Miscellaneous

TO: Nadeem Bezar, Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ("LSLLC") on behalf of Daniel Oberdick intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 04/06/2018

CC: Daniel Oberdick of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf of:

Daniel Oberdick
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

COUNSEL LISTING FOR B. ETAL VS. ROOSEVELT INN LLC ETAL

County of Philadelphia Court of Common Pleas

Counsel

Bezar, Esquire, Nadeem

Firm

1525 Locust Street
Philadelphia, PA 19102
P: 215-772-1000 F: 215-772-1005

Counsel Type

Opposing Counsel

COMMONWEALTH OF PENNSYLVANIA

COUNTY OF PHILADELPHIA

B. ETAL
vs.
Roosevelt Inn LLC ETAL

Court of Common Pleas
March Term, 2017, No. 0712

Request For Records Copies Related To Subpoena Document Request

Provider:

Copy Sets Requested:

A Second Chance, Inc. - Kinship Care

Please return this completed form to Litigation Solutions, LLC. Please be advised that Litigation Solutions, LLC requires prepayment for all requested records above. Therefore, once the requested records are obtained an invoice for prepayment will be generated and sent directly to your attention. This prepayment includes a \$5.00 administrative fee. Once payment has been received the records will be promptly forwarded to your attention.

If you should happen to have any questions or concerns regarding this matter, please don't hesitate to contact Beth Benson at 412-253-1099 or fax at 412-246-9106, , 412.882.3477.

Date of Issue: 04/06/2018



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A Second Chance, Inc. - Kinship Care

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Daniel Oberdick, Esquire

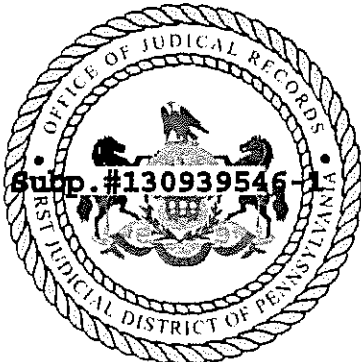
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:

Date: April 06, 2018



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A Second Chance, Inc. - Kinship Care
1341 N. Delaware Avenue #101
Philadelphia PA 19125

Subject: REDACTED

Requested Items:

Please Remit: Any and all records related to the subject above, including but not limited to: Service Records; Treatment Records; Handwritten Notes; E-Mail communication regarding same.

**CONFIDENTIAL
DOCUMENT FORM****APPELLATE/TRIAL COURT
CASE RECORDS**

Public Access Policy of the Unified Judicial System of Pennsylvania:
Case Records of the Appellate and Trial Courts
 204 Pa. Code § 213.81
 www.pacourts.us/public-records

B. ETAL VS ROOSEVELT INN LLC ETAL

Case Caption

170300712

Docket/Case No.

Philadelphia

Court

This form is associated with the pleading titled Discovery Hearing Request, dated May 8, 2018.

Pursuant to the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts*. The Confidential Document Form shall accompany a filing where a confidential document is required by law, ordered by the courts, or is otherwise necessary to effect the disposition of a matter. This form shall be accessible to the public, however the documents attached will not be publicly accessible, except as ordered by a court. The documents attached will be available to the parties, counsel of record, the courts and the custodian. **Please only attach documents necessary for the purpose of this case.** Complete the entire form and check all that apply. This form and any additional pages must be served on all unrepresented parties and counsel of record.

Type of Confidential Document	Paragraph, page, etc. where the confidential document is reference in the filing:
<input type="checkbox"/> Financial Source Documents	
<input type="checkbox"/> Tax Returns and schedules	
<input type="checkbox"/> W-2 forms and schedules including 1099 forms or similar documents	
<input type="checkbox"/> Wage stubs, earning statements, or other similar documents	
<input type="checkbox"/> Credit card statements	
<input type="checkbox"/> Financial institution statements (e.g., investment/bank statements)	
<input type="checkbox"/> Check Registers	
<input type="checkbox"/> Checks or equivalent	
<input type="checkbox"/> Loan application documents	
<input checked="" type="checkbox"/> Minors' educational records	
<input type="checkbox"/> Medical/Psychological records	
<input type="checkbox"/> Children and Youth Services' records	
<input type="checkbox"/> Marital Property Inventory and Pre-Trial Statement as provided in Pa.R.C.P.No.1920.33	
<input type="checkbox"/> Income and Expense Statement as provided in Pa.R.C.P. No. 1910.27(c)	
<input type="checkbox"/> Agreements between the parties as used in 23 Pa.C.S. §3105	

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Signature of Attorney or Unrepresented Party

Name: Daniel E. OberdickAddress: Blank Rome Llp One Logan Square 130 N.
18th Street Philadelphia Pa 1910308-MAY-2018

Date

Attorney Number (if applicable): 309676Telephone: (215)569-5436Email: doberdick@blankrome.com**Rev. 12/2017**

**CONFIDENTIAL
DOCUMENT FORM**



**APPELLATE/TRIAL COURT
CASE RECORDS**

Instructions for Completing the Confidential Document Form

The following documents are confidential and shall be filed with a court or custodian with the "Confidential Document Form":

1. Financial Source Documents as listed on the form
2. Minors' educational records
3. Medical/Psychological records are defined as "records relating to the past, present, or future physical or mental health or condition of an individual"
4. Children and Youth Services' records
5. Marital Property Inventory and Pre-Trial Statement as provided in Pa.R.C.P. No. 1920.33
6. Income and Expense Statement as provided in Pa.R.C.P. No. 1910.27(c)
7. Agreements between the parties as used in 23 Pa.C.S. §3105

For each confidential document, list the paragraph, page, etc. where the document is referenced in the filing. Please note, this form does not need to be filed in types of cases that are sealed or exempted from public access pursuant to applicable authority (e.g. juvenile, adoption, etc.)

- **Please only attach documents necessary for the purposes of this case.**
- Complete the entire form and check all that apply.
- This form, and any additional pages, must be served on all unrepresented parties and counsel of record.

A court or custodian is not required to review or redact any filed document for compliance with the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts*. A party's or attorney's failure to comply shall not affect access to case records that are otherwise accessible.

If a filed document fails to comply with the above referenced policy, a court may, upon motion or its own initiative, with or without a hearing, order the filed document sealed, redacted, amended or any combination thereof. A court may impose sanctions, including costs necessary to prepare a compliant document for filing in accordance with applicable authority.

Rev. 12/2017

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

Filed and Attested by the
Office of Judicial Records
07 MAY 2018 05:36 pm
M. TIERNEY

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

ORDER

AND NOW, this ____ day of _____ 2018, upon consideration of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Overrule Minor Plaintiff M.B.'s Objections to Subpoena, and any response thereto, it is hereby **ORDERED** that Minor Plaintiff M.B.'s Objections are **OVERRULED**. It is further **ORDERED** that Defendants may serve the proposed subpoenas on Minor Plaintiff M.B.'s mother, father and brother.

BY THE COURT:

.J

Discovery End Date: October 1, 2018

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
 Attorney Bar I.D. No.: 57686
 James J. Quinlan, Esquire
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*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S MOTION TO OVERRULE
PLAINTIFF'S OBJECTIONS TO AND COMPEL THE SERVICE OF
SUBPOENAS TO PRODUCE DOCUMENTS AND THINGS ON PLAINTIFF'S
FAMILY MEMBERS**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively “the Roosevelt Defendants”), by their undersigned counsel, hereby file

this Motion to Overrule Objections to Subpoena (the “Motion”) pursuant to Pa. R. Civ. P. 4009.21 and, in support therefore, state as follows:

1. Plaintiff commenced this civil action on March 10, 2017, alleging violations of Pennsylvania’s Human Trafficking Law and asserting negligence claims against the Roosevelt Defendants and Alpha-Centurion Security, Inc.

2. In her Complaint, Plaintiff alleges that from 2013 through 2014, she was “recruited, enticed, solicited, harbored, and/or transported to engage in commercial sex acts” on the Roosevelt Defendants’ premises on a “regular, consistent and/or repeated basis.” Plaintiff alleges that during this time period, she occupied approximately half of the rooms at the Roosevelt Inn.

3. Plaintiff’s allegations place a number of facts at issue, including, but not limited to: 1) whether Plaintiff was trafficked; and, if she was trafficked 2) whether she was trafficked on the Roosevelt Defendants’ premises; and, if so 3) when she was trafficked on said premises.

4. To date, Plaintiff has failed to identify a single calendar day that she was at the Roosevelt Inn.

5. On October 6, 2017, the Roosevelt Defendants served Notices of Intent to issue subpoenas to Plaintiff’s family members seeking information related to Plaintiff’s whereabouts during the time period she alleges she was trafficked. Plaintiff objected to these subpoenas on the grounds that 1) Plaintiff’s family members are not parties to this action, 2) the subpoenas serve only to “harass, annoy and cause a burden to Plaintiff’s family members,” and 3) the subpoenas are “unclear, unreasonably vague and overbroad.”

6. In response, the Roosevelt Defendants revised the subpoenas to clarify the information being sought from Plaintiff’s family members and reissued Notices of Intent on March 27, 2018. A true and correct redacted copy of the Notices of Intent are attached as Exhibit “A.”

7. However, before the revised subpoenas could be issued, Plaintiff filed the exact same objections once again claiming that the subpoenas are improper because 1) Plaintiff's family members are not parties to this action, 2) the subpoenas serve only to "harass, annoy and cause a burden to Plaintiff's family members," and 3) the subpoenas are "unclear, unreasonably vague and overbroad."¹ See Plaintiff's Objections to Notices of Intent to Serve Subpoenas on Plaintiff's family members, attached as Exhibit "B."

8. Plaintiff's regurgitated boilerplate objections are meritless and seek only to prevent the Roosevelt Defendants from testing the veracity of Plaintiff's allegations.

9. However, in an effort to resolve this dispute without involving the Court, on April 18, 2018, the Roosevelt Defendants corresponded with Plaintiff's Counsel and asked that Plaintiff withdraw her objections within ten days. To date, Plaintiff has failed to respond to that request.

10. Accordingly, the Roosevelt Defendants file this Motion seeking an Order overruling Plaintiff's objections and compelling the subpoenas to be served on Plaintiff's family members.

11. Notwithstanding Plaintiff's "boilerplate" objections, each category of information requested from Plaintiff's family members is clearly relevant to her claims since Plaintiff's whereabouts during the time period she was allegedly trafficked at the Roosevelt Inn is critical to establishing both liability and the damages that were allegedly suffered. As such, the Roosevelt Defendants are entitled to seek information from Plaintiff's family members that is reasonably

¹ It should be noted that Plaintiff objected to the wrong subpoenas issued by the Roosevelt Defendants. More specifically, the proposed subpoenas to which Plaintiff objects and attached to those objections were issued on October 6, 2017. Plaintiff previously objected to those proposed subpoenas. In response to Plaintiff's prior objections, the Roosevelt Defendants revised the subpoena language and reissued Notices of Intent on March 27, 2018. These proposed subpoenas were neither attached nor included in Plaintiff's objections.

likely to lead to the discovery of admissible evidence at trial pertaining to the issues of both liability and damages.

12. Despite the Pennsylvania Rules of Civil Procedure specifically permitting the Roosevelt Defendants to seek the requested information from Plaintiff's family members, Plaintiff has nevertheless objected to the proposed subpoenas. More specifically, Plaintiff objected to the Roosevelt Defendants' subpoenas as follows:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) [Plaintiff's] place of residence; (2) People or organizations that were responsible for caring for [Plaintiff]; (3) [Plaintiff's] education; (4) [Plaintiff's] social activities; (5) [Plaintiff's] arrests and/or contact with law enforcement and the courts; (6) [Plaintiff's] cellular phone provider(s); and (7) [Plaintiff's] experience of being the victim of human sex trafficking.

Objections:

8. Here, Defendants' proposed Subpoenas directed to Plaintiff's parents and brother are in violation of Rule 4011.
9. First, Plaintiff's parents and brother are not parties to this action.
10. Second, these Subpoenas to Plaintiff's immediate family would serve only to harass, annoy and cause a burden to Plaintiff's family.
11. Third, the Subpoenas are unclear, unreasonably vague and overbroad, and Plaintiffs [sic] object [sic] for this reason also.
12. Accordingly, Plaintiffs [sic] object [sic] to Defendants' proposed subpoenas.

See Exhibit "B."

13. As this Court is well aware, a party is entitled to seek information relevant to the subject matter of the lawsuit if the subpoena appears reasonably calculated to lead to the discovery

of admissible evidence. *Miller v. Grunfelder*, No. 12726 CIVIL 2008, 2013 Pa. Dist. & Cnty. Dec. Lexis 416, at *7 (Pa. D. & C. July 12, 2013).

14. “It is well established that the fundamental consideration in determining the admissibility of evidence is whether the proffered evidence is relevant to the fact sought to be proved. Evidence is relevant if it tends to make a fact at issue more or less probable.” *Martin v. Soblotney*, 502 Pa. 418, 422 (Pa. 1983) (citation omitted).

15. Further, “Pennsylvania [courts] find[] evidence relevant ‘when it tends to establish facts in issue,’ or when it ‘in some degree advances the inquiry and thus has probative value[.]’” *Whistler Sportswear, Inc. v. Rullo*, 289 Pa. Super. 230, 243 (Pa. Super. 1981).

16. Here, Plaintiff’s objections to the Notices should be overruled as the information sought from Plaintiff’s family members is certainly relevant to the issues being litigated in this case – whether Plaintiff was trafficked at the Roosevelt Inn and, if so, when Plaintiff was trafficked.

17. Discovery exchanged to this point only further substantiates the Roosevelt Defendants’ entitlement to obtain documents and information concerning Plaintiff’s whereabouts during the time period alleged because, to date, Plaintiff has failed to identify a single calendar day that she was allegedly at the Roosevelt Inn.

18. Clearly, all of the categories of information requested relate to Plaintiff’s whereabouts, are germane to the claims asserted in Plaintiff’s Complaint and lie precisely within the scope of obtainable discovery articulated in Pa.R.C.P. 4003.1 (a).

19. Certainly, none of the requested discovery could be considered unreasonably burdensome since the requests are all probative of Plaintiff’s claims and resultant damages. Plaintiff’s boilerplate objections are therefore meritless and must be overruled.

20. In light of the above facts, and pursuant to Pa. R. Civ. P. 4009.21(d)(1), the Roosevelt Defendants respectfully request this Court overrule Plaintiff's objections and enter an order compelling the noticed subpoenas to be served on Plaintiff's family members.

WHEREFORE, the Roosevelt Defendants respectfully request that this Court grant their Motion and enter an Order overruling Plaintiff's objections and compelling the subpoenas to be served on Plaintiff's family members.

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

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Dated: May 7, 2018

BLANK ROME LLP

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*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

**DEFENDANTS ROOSEVELT INN LLC, ET AL.'S MEMORANDUM OF LAW
IN SUPPORT OF THEIR MOTION TO OVERRULE PLAINTIFF'S
OBJECTIONS TO AND COMPEL THE SERVICE OF SUBPOENAS TO
PRODUCE DOCUMENTS AND THINGS ON
PLAINTIFF'S FAMILY MEMBERS**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively the “Roosevelt Defendants”), by their undersigned counsel, hereby file

this Memorandum of Law in Support of their Motion to Overrule M.B.’s Objections to and Compel the Service of Subpoenas to Produce Documents and Things on Plaintiff’s family members (the “Motion”).

I. FACTUAL AND PROCEDURAL BACKGROUND

Plaintiff commenced this civil action on March 10, 2017, alleging violations of Pennsylvania’s Human Trafficking Law and asserting negligence claims against the Roosevelt Defendants and Alpha-Centurion Security, Inc. In her Complaint, Plaintiff alleges that from 2013 through 2014, she was “recruited, enticed, solicited, harbored, and/or transported to engage in commercial sex acts” on the Roosevelt Defendants’ premises on a “regular, consistent and/or repeated basis.” Plaintiff alleges that during this time period, she occupied approximately half of the rooms at the Roosevelt Inn. Plaintiff’s allegations place a number of facts at issue, including: 1) whether Plaintiff was trafficked; and if she was trafficked 2) whether she was trafficked on the Roosevelt Defendants’ premises; and, if so 3) when she was trafficked on said premises. To date, Plaintiff has failed to identify a single calendar day that she was at the Roosevelt Inn.

On October 6, 2017, the Roosevelt Defendants served Notices of Intent to issue subpoenas to Plaintiff’s family members seeking information related to Plaintiff’s whereabouts during the timer period she alleges she was trafficked. Plaintiff objected to these subpoenas on the grounds that 1) Plaintiff’s family members are not parties to this action, 2) the subpoenas serve only to “harass, annoy and cause a burden to Plaintiff’s family members,” and 3) the subpoenas are “unclear, unreasonably vague and overbroad.” In response, the Roosevelt Defendants revised the subpoenas to clarify the information being sought from Plaintiff’s family members and reissued the Notices of Intent on March 27, 2018. A true and correct copy of the Notices of Intent are attached as Exhibit “A.” However, before the revised subpoenas could be issued, Plaintiff filed

the same objections once again claiming that the subpoenas are improper because 1) Plaintiff's family members are not parties to this action, 2) the subpoenas serve only to "harass, annoy and cause a burden to Plaintiff's family members," and 3) the subpoenas are "unclear, unreasonably vague and overbroad."² See Plaintiff's Objections to Notices of Intent to Serve Subpoenas on Plaintiff's family members, attached as Exhibit "B." Plaintiff's boilerplate objections are meritless and seek only to prevent the Roosevelt Defendants from testing the veracity of Plaintiff's allegations. However, in an effort to resolve this dispute without involving the Court, on April 18, 2018, the Roosevelt Defendant's corresponded with Plaintiff and asked her to withdraw her objections within ten days. To date, Plaintiff has failed to respond to that request. Accordingly, the Roosevelt Defendants file this Motion seeking an Order overruling Plaintiff's objections and compelling the subpoenas to be served on Plaintiff's family members.

II. QUESTION INVOLVED

1. Should Plaintiff's Objections to the Notices of Intent to Serve Subpoenas on Plaintiff's family members be overruled because the subpoenas are narrowly tailored, seek discoverable information and are not unclear, unreasonably vague or overbroad?

SUGGESTED ANSWER: Yes.

III. ARGUMENT

A. Legal Standard

Pa.R.C.P. 4003.1 of the Pennsylvania Rules of Civil Procedure specifically permits a party to an action to obtain information, documents and things through discovery. In relevant part, the rule states:

² It should be noted that Plaintiff objected to the wrong subpoenas issued by the Roosevelt Defendants. More specifically, the proposed subpoenas to which Plaintiff objects and attached to those objections were issued on October 6, 2017. Plaintiff previously objected to those proposed subpoenas. In response to Plaintiff's prior objections, the Roosevelt Defendants revised the subpoena language and reissued Notices of Intent on March 27, 2018. These proposed subpoenas were neither attached nor included in Plaintiff's objections.

(a) ... a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identify and location of persons having knowledge of any discoverable matter.

Pa.R.C.P. 4003.1(a).

Significantly, the scope of allowable discovery under Pa.R.C.P. 4003.1 is far reaching.

Pa.R.C.P. 4009.1 articulates how a party may acquire this information from a non-party through the issuance of subpoenas:

(a) **Any party may serve ... a subpoena upon a person not a party pursuant to Rules 4009.21 through 4009.27** to produce and permit the requesting party, or someone acting on the party's behalf, to inspect and copy any designated documents (including writings, drawings, graphs, charts, photographs, and electronically stored information), or to inspect, copy, test or sample any tangible things or electronically stored information, which constitute or contain matters within the scope of Rules 4003.1 through 4003.6 inclusive and which are in the possession, custody or control of the party or person upon whom the request or subpoena is served, and may do so one or more times.

Pa.R.C.P. 4009.1(a) (emphasis added).

As discussed, *infra*, the information the Roosevelt Defendants seek to obtain from Plaintiff's family members pursuant to the instant subpoenas and to which Plaintiff objects, falls precisely within the definition of obtainable discovery provided by Pa.R.C.P. 4003.1(a). Pursuant to Pa.R.C.P. 4009.21 (d)(1), "[i]f objections are received by the party intending to serve the subpoena prior to its service, the subpoena shall not be served. **The court upon motion shall rule upon the objections and enter an appropriate order.**" *Id.* (emphasis added). Accordingly, the Roosevelt Defendants now file the instant motion seeking an order overruling Plaintiff's objections and compelling service of the subpoenas on Plaintiff's family members.

B. The Discovery Sought from the Proposed Subpoenas Directly Relates to Plaintiff's Claims Regarding Her Whereabouts During the Time Period She Alleges She was Trafficked

In response to the subpoenas the Roosevelt Defendants noticed to be served on Plaintiff's family members, Plaintiff filed boilerplate and meritless objections that willfully ignore the underlying facts and allegations Plaintiff set forth in her Complaint. Notwithstanding these "boilerplate" objections, each category of information requested from Plaintiff's family members is clearly relevant to her claims since Plaintiff's whereabouts during the time period she was allegedly trafficked at the Roosevelt Inn is critical to establishing both liability and the damages that were allegedly suffered. As such, the Roosevelt Defendants are entitled to seek information from Plaintiff's family members that is reasonably likely to lead to the discovery of admissible evidence at trial pertaining to the issues of both liability and damages.

Despite the Pennsylvania Rules of Civil Procedure specifically permitting the Roosevelt Defendants to seek the requested information from Plaintiff's family members, Plaintiff has nevertheless objected to the proposed subpoenas. More specifically, Plaintiff objected to the Roosevelt Defendant's subpoenas as follows:

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) [Plaintiff's] place of residence; (2) People or organizations that were responsible for caring for [Plaintiff]; (3) [Plaintiff's] education; (4) [Plaintiff's] social activities; (5) [Plaintiff's] arrests and/or contact with law enforcement and the courts; (6) [Plaintiff's] cellular phone provider(s); and (7) [Plaintiff's] experience of being the victim of human sex trafficking.

Objections:

8. Here, Defendants' proposed Subpoenas directed to Plaintiff's parents and brother are in violation of Rule 4011.

9. First, Plaintiff's parents and brother are not parties to this action.
10. Second, these Subpoenas to Plaintiff's immediate family would serve only to harass, annoy and cause a burden to Plaintiff's family.
11. Third, the Subpoenas are unclear, unreasonably vague and overbroad, and Plaintiffs [sic] object [sic] for this reason also.
12. Accordingly, Plaintiffs [sic] object [sic] to Defendants' proposed subpoenas.

See Exhibit "B."

As this Court is well aware, a party is entitled to seek information relevant to the subject matter of the lawsuit if the subpoena appears reasonably calculated to lead to the discovery of admissible evidence. *Miller v. Grunfelder*, No. 12726 CIVIL 2008, 2013 Pa. Dist. & Cnty. Dec. Lexis 416, at *7 (Pa. D. & C. July 12, 2013). "It is well established that the fundamental consideration in determining the admissibility of evidence is whether the proffered evidence is relevant to the fact sought to be proved. Evidence is relevant if it tends to make a fact at issue more or less probable." *Martin v. Soblotney*, 502 Pa. 418, 422 (Pa. 1983) (citation omitted). Further, "Pennsylvania [courts] find[] evidence relevant 'when it tends to establish facts in issue,' or when it 'in some degree advances the inquiry and thus has probative value[.]'" *Whistler Sportswear, Inc. v. Rullo*, 289 Pa. Super. 230, 243 (Pa. Super. 1981).

Here, Plaintiff's objections to the Notices should be overruled as the information sought from Plaintiff's family members is certainly relevant to the issues being litigated in this case – whether Plaintiff was trafficked at the Roosevelt Inn and, if so, when Plaintiff was trafficked. And, discovery exchanged to this point only further substantiates the Roosevelt Defendants' entitlement to obtain documents and information concerning Plaintiff's whereabouts during the time period alleged because, to date, Plaintiff has failed to identify a single calendar day that she was allegedly

at the Roosevelt Inn. Clearly, all of the categories of information requested relate to Plaintiff's whereabouts, are germane to the claims asserted in Plaintiff's Complaint and lie precisely within the scope of obtainable discovery articulated in Pa.R.C.P. 4003.1 (a). Certainly, none of the requested discovery could be considered unreasonably burdensome since the requests are all probative of Plaintiff's claims and resultant damages. Plaintiff's boilerplate objections are therefore meritless and must be overruled.

IV. **RELIEF REQUESTED**

In light of the above facts, and pursuant to Pa. R. Civ. P. 4009.21(d)(1), the Roosevelt Defendants respectfully request this Court overrule Plaintiff's objections and enter an order compelling the noticed subpoenas to be served on Plaintiff's family members.

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

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(215) 569-5500

Dated: May 7, 2018

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
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 Justina L. Byers, Esquire
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*Attorneys for Defendants,
 Roosevelt Inn LLC d/b/a Roosevelt Inn and
 Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
 d/b/a Roosevelt Motor Inn,
 UFVS Management Company, LLC and
 Yagna Patel*

M.B., minor by her Guardian,
 William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
 d/b/a ROOSEVELT INN and
 ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
 PHILADELPHIA COUNTY
 CIVIL TRIAL DIVISION

MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED

ATTORNEY CERTIFICATION OF GOOD FAITH

The undersigned counsel for movant hereby certifies and attest that:

☒a. He or she has had the contacts described below with opposing counsel or unrepresented party regarding discovery matter contained in the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so without Court intervention.

Defendants' counsel has contacted counsel for Plaintiff and requested that Plaintiff withdraw her objections to the proposed subpoenas. To date, counsel for Plaintiff has failed to withdraw her objections. Therefore, Defendants may only obtain the discovery they seek by way of a discovery motion.

☐b. He or she was unsuccessful in actually contacting opposing counsel or unrepresented party in an attempt to resolve the discovery dispute(s) despite his or her good faith efforts to do so.

CERTIFIED TO THE COURT BY:

BLANK ROME LLP

/s/ James J. Quinlan

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309767)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 7, 2018

CERTIFICATE OF SERVICE

I, James J. Quinlan, Esquire, hereby certify that, on this 7th day of May 2018, I caused a true and correct copy of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Overrule Objections and Compel Service of Subpoenas to be served via the Court's electronic filing system and/or electronic mail upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

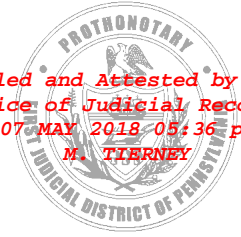
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Philadelphia, PA 19103

*Attorneys for Defendant,
Alpha-Centurion Security, Inc.*

/s/ James J. Quinlan
JAMES J. QUINLAN

EXHIBIT A

*Filed and Attested by the
Office of Judicial Records
07 MAY 2018 05:36 pm
M. TIERNEY*



PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

**B. ETAL
vs.
Roosevelt Inn LLC ETAL**

Court of Common Pleas

March Term, 2017, No. 0712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21**

Provider:	Record Type:
A Second Chance, Inc. - Kinship Care	Medical
R.B.	Miscellaneous
Joseph J. Peters Institute	Medical
K.M.B.	Miscellaneous
A.P.	Miscellaneous

TO: Nadeem Bezar, Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 03/27/18

CC: Daniel Oberdick of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf of:

Daniel Oberdick
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: R.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 27, 2018

Name: Daniel Oberdick, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

R.B.

Subject: REDACTED

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: K.M.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 27, 2018

Name: Daniel Oberdick, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

K.M.B.

Subject: REDACTED

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A.P.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 27, 2018

Name: Daniel Oberdick, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A.P.

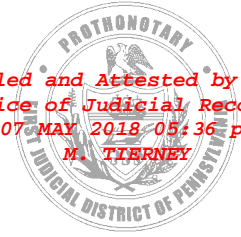
Subject: REDACTED

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.

EXHIBIT B

*Filed and Attested by the
Office of Judicial Records
07 MAY 2018 05:36 pm
M. TIERNEY*

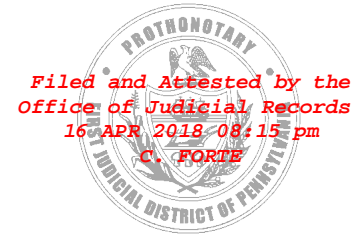


KLINE & SPECTER, P.C.

Attorneys for Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

OBJECTIONS TO SUBPOENA PURSUANT TO Pa.R.C.P. 4009.21

Plaintiff M.B, by her Guardian, William Calandra, Esq., by and through counsel, Kline & Specter, P.C., hereby objects to Defendants' proposed Subpoenas that are attached to these objections for the following reasons:

1. This lawsuit arises from injuries Plaintiff sustained as a victim of sex trafficking at Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC, and Yagna Patel's motel.

2. A Complaint in this matter was filed on March 10, 2017, and on September 5, 2017, Plaintiffs filed an Amended Complaint.

3. On March 27, 2018, the Roosevelt Inn Defendants issued a Notice of Intent to Serve a Subpoena.

4. Included among the proposed Subpoenas are three (3) proposed Subpoenas addressed to members of Plaintiff M.B.'s immediate family, including her mother, father and brother who are not parties to this lawsuit.

5. The three Subpoenas to which Plaintiff objects are addressed to M.B.'s father, R.B.; M.B.'s mother, K.B. and M.B.'s brother, A.P. See Riders to Defendants' Subpoenas to R.B., K.B. and A.P., attached as Exhibit "A".

6. Each of the Subpoenas directed to Plaintiff's mother, father and brother contains the identical language below:

Subject: M.B.

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.

7. The foregoing information sought from Plaintiff's immediate family members is beyond the scope of discovery, pursuant to Pa. R.C.P. 4011 which provides, in pertinent part:

Rule 4011: Limitation of scope of discovery:

No discovery, including discovery of electronically stored information, shall be permitted which:

(a) is sought in bad faith;

(b) would cause unreasonable annoyance, embarrassment, oppression, burden or expense to the deponent or any person or party;

...

(e) would require the making of an unreasonable investigation by the deponent or any party or witness.

8. Here, Defendants' proposed Subpoenas directed to Plaintiff's parents and brother are in violation of Rule 4011.

9. First, Plaintiff's parents and brother are not parties to this action.

10. Second, these Subpoenas to Plaintiff's immediate family would serve only to harass, annoy and cause a burden to Plaintiff's family.

11. Third, the Subpoenas are unclear, unreasonably vague and overbroad, and Plaintiffs object for this reason also.

12. Accordingly, Plaintiffs object to Defendants' proposed Subpoenas.

13. Pursuant to Pa. R.C.P. 4009.21(c), any party may object to the subpoena by filing of record written objections and serving a copy of the objections upon every other party to the action.

14. If objections are received by the party intending to serve the subpoena prior to its service, the subpoena shall not be served. Pa. R.C.P. 4009.21(d)(1).

15. For all the above reasons, Plaintiffs object to Defendants' proposed Subpoenas directed to Plaintiff's parents and brother, R.B., K.B. and A.P., attached as Exhibit "A".

WHEREFORE, Plaintiffs file this Objection in accordance with Pa. R.C.P. 4009.21.

Respectfully submitted,

KLINE & SPECTER, P.C.

BY: /s/ Kyle B. Nocho
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Plaintiffs

Date: 4/16/2018

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for the Plaintiffs in this matter and hereby verify that the statements made in the foregoing Plaintiffs' Objections to Subpoenas pursuant to Pa. R.C.P. 4009.21 are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.

/s/ Kyle B. Nocho
KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiff

Dated: 4/16/2018

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 16th day of April, 2018, the foregoing Minor-Plaintiff's Plaintiffs' Objections to Subpoena pursuant to Pa. R.C.P. 4009.21 was electronically filed and served.

Upon acceptance electronically the below listed counsel; and:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103
President of Defendant Alpha-Centurion Security, Inc.

I do hereby certify that a true and correct copy of the above Plaintiffs' Objections to Subpoena pursuant to Pa.R.C.P. 4009.21 was served by facsimile on the following on the below date:

Litigation Solutions, LLC
Brentwood Towne Center
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227
Phone: 412-263-5656 Fax: 412-226-9106

KLINE & SPECTER, P.C.

/s/ Kyle B. Nocho
KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiff

Date 4/16/2018

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

M.B., a minor by her Guardian, William A. Calandra, Esquire

vs.

Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Co, LLC, and Yagna Patel

Court of Common Pleas

March Term, 2017, No. 0712

Filed and Attested by the
Office of Judicial Records

16 SEP 2017 08:15 PM

C. FORTE

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR PRODUCTION TO
RULE 4009.21

Provider:

Record Type:

Warren G. Harding Middle School	Scholastic
Wordsworth Academy	Scholastic
Hazleton Elementary Middle School	Scholastic
George W. Sharswood Elementary School	Scholastic
Arthur Street Elementary School	Scholastic
A.P.	Miscellaneous
K.B.	Miscellaneous
R.B.	Miscellaneous
A Second Chance Inc. - Kinship Care	Medical
The Villa - Public Health Management Corporation	Medical
David Abel	Medical
Joseph J. Peters Institute	Medical
David Abel	Medical
The Bridge Therapeutic Center at Fox Chase	Medical
Lois Harrold	Medical
Lois Harrold	Medical
Y-HEP Health Center	Medical
Patricia H. Morgan MSN CRNP	Medical
Pennsylvania Hospital - Hall-Mercer Community Mental Health	Medical
Pepper George Middle School	Scholastic

TO: Thomas R. Kline Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ("LSLLC") on behalf of Justina Byers Esquire intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 10/06/2017

Litigation Solutions, LLC on behalf
of:

CC: Justina Byers Esquire of Blank Rome LLP - Court of Common Pleas

Justina Byers Esquire
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Dr. R.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 06, 2017

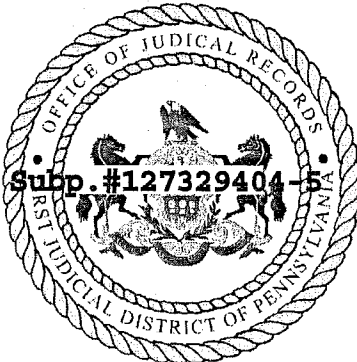
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

R.B.
[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: K.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

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This subpoena was issued at the request of the following person:

Date: October 06, 2017

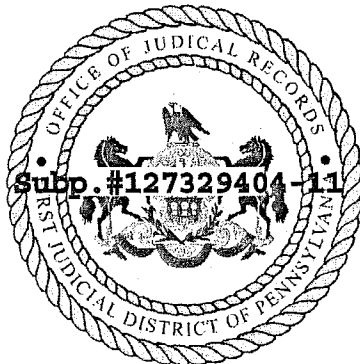
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

K.B.
[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A.P.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions.

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

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This subpoena was issued at the request of the following person:

Date: October 06, 2017

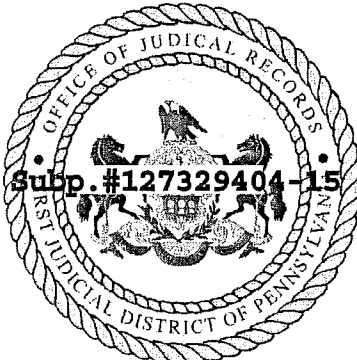
Name: Justina Byers, Esquire

Address: 130 North 18th St.
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A.P.

[address redacted]

Subject: M.B.

Requested Items:

Please Remit: All documents and correspondence including emails, texts, communications of any kind relating to the residence of, custody of, care for, activities of, education of, legal issues of, arrests of, the cellular provider(s) for, exploitation of, assault and sexual assault of M.B. from 2012 through present.

**CONFIDENTIAL
DOCUMENT FORM****APPELLATE/TRIAL COURT
CASE RECORDS**

*Public Access Policy of the Unified Judicial System of Pennsylvania:
Case Records of the Appellate and Trial Courts
204 Pa. Code § 213.81
www.pacourts.us/public-records*

B. ETAL VS ROOSEVELT INN LLC ETAL

Case Caption

170300712

Docket/Case No.

Philadelphia

Court

This form is associated with the pleading titled Discovery Hearing Request, dated May 31, 2018.

Pursuant to the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts*. The Confidential Document Form shall accompany a filing where a confidential document is required by law, ordered by the courts, or is otherwise necessary to effect the disposition of a matter. This form shall be accessible to the public, however the documents attached will not be publicly accessible, except as ordered by a court. The documents attached will be available to the parties, counsel of record, the courts and the custodian. **Please only attach documents necessary for the purpose of this case.** Complete the entire form and check all that apply. This form and any additional pages must be served on all unrepresented parties and counsel of record.

Type of Confidential Document	Paragraph, page, etc. where the confidential document is reference in the filing:
<input type="checkbox"/> Financial Source Documents	
<input type="checkbox"/> Tax Returns and schedules	
<input type="checkbox"/> W-2 forms and schedules including 1099 forms or similar documents	
<input type="checkbox"/> Wage stubs, earning statements, or other similar documents	
<input type="checkbox"/> Credit card statements	
<input type="checkbox"/> Financial institution statements (e.g., investment/bank statements)	
<input type="checkbox"/> Check Registers	
<input type="checkbox"/> Checks or equivalent	
<input type="checkbox"/> Loan application documents	
<input type="checkbox"/> Minors' educational records	
<input checked="" type="checkbox"/> Medical/Psychological records	
<input type="checkbox"/> Children and Youth Services' records	
<input type="checkbox"/> Marital Property Inventory and Pre-Trial Statement as provided in Pa.R.C.P.No.1920.33	
<input type="checkbox"/> Income and Expense Statement as provided in Pa.R.C.P. No. 1910.27(c)	
<input type="checkbox"/> Agreements between the parties as used in 23 Pa.C.S. §3105	

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Signature of Attorney or Unrepresented Party

31-MAY-2018

Date

Name: Daniel E. OberdickAttorney Number (if applicable): 309676Address: Blank Rome Llp One Logan Square 130 N.
18th Street Philadelphia Pa 19103Telephone: (215)569-5436Email: doberdick@blankrome.com**Rev. 12/2017**

**CONFIDENTIAL
DOCUMENT FORM**



**APPELLATE/TRIAL COURT
CASE RECORDS**

Instructions for Completing the Confidential Document Form

The following documents are confidential and shall be filed with a court or custodian with the "Confidential Document Form":

1. Financial Source Documents as listed on the form
2. Minors' educational records
3. Medical/Psychological records are defined as "records relating to the past, present, or future physical or mental health or condition of an individual"
4. Children and Youth Services' records
5. Marital Property Inventory and Pre-Trial Statement as provided in Pa.R.C.P. No. 1920.33
6. Income and Expense Statement as provided in Pa.R.C.P. No. 1910.27(c)
7. Agreements between the parties as used in 23 Pa.C.S. §3105

For each confidential document, list the paragraph, page, etc. where the document is referenced in the filing. Please note, this form does not need to be filed in types of cases that are sealed or exempted from public access pursuant to applicable authority (e.g. juvenile, adoption, etc.)

- **Please only attach documents necessary for the purposes of this case.**
- Complete the entire form and check all that apply.
- This form, and any additional pages, must be served on all unrepresented parties and counsel of record.

A court or custodian is not required to review or redact any filed document for compliance with the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts*. A party's or attorney's failure to comply shall not affect access to case records that are otherwise accessible.

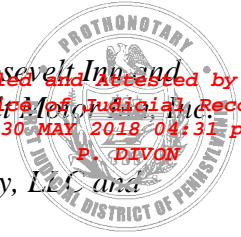
If a filed document fails to comply with the above referenced policy, a court may, upon motion or its own initiative, with or without a hearing, order the filed document sealed, redacted, amended or any combination thereof. A court may impose sanctions, including costs necessary to prepare a compliant document for filing in accordance with applicable authority.

Rev. 12/2017

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
Attorney Bar I.D. No.: 57686
James J. Quinlan, Esquire
Attorney Bar I.D. No.: 200944
Justina L. Byers, Esquire
Attorney Bar I.D. No.: 76773
Daniel E. Oberdick, Esquire
Attorney Bar I.D. No.: 309676
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130 North 18th Street
Philadelphia, PA 19103-6998
Tel.: (215) 569-5500
Fax: (215) 569-5555
Email: palmer@blankrome.com
quinlan@blankrome.com
byers@blankrome.com
doberdick@blankrome.com

*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*



M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

NOTICE OF PRESENTATION

Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kyle B. Nocho, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103

PLEASE TAKE NOTICE that the Motion of Defendants, Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel, to Enforce Subpoena and Compel

Production of Documents and Things on the Joseph J. Peters Institute will be presented to the Court on June 12, 2018, at 9:00 AM, in Court Room 625, City Hall, Philadelphia, PA.

BLANK ROME LLP

/s/ Daniel E. Oberdick

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309676)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 30, 2018

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
 Attorney Bar I.D. No.: 57686
 James J. Quinlan, Esquire
 Attorney Bar I.D. No.: 200944
 Justina L. Byers, Esquire
 Attorney Bar I.D. No.: 76773
 Daniel E. Oberdick, Esquire
 Attorney Bar I.D. No.: 309676
 One Logan Square
 130 North 18th Street
 Philadelphia, PA 19103-6998
 Tel.: (215) 569-5500
 Fax: (215) 569-5555
 Email: palmer@blankrome.com
 quinlan@blankrome.com
 byers@blankrome.com
 doberdick@blankrome.com

*Attorneys for Defendants,
 Roosevelt Inn LLC d/b/a Roosevelt Inn and
 Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
 d/b/a Roosevelt Motor Inn,
 UFVS Management Company, LLC and
 Yagna Patel*

M.B., minor by her Guardian,
 William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
 d/b/a ROOSEVELT INN and
 ROOSEVELT INN CAFÉ, et al.,

:
 :
 : COURT OF COMMON PLEAS
 : PHILADELPHIA COUNTY
 : CIVIL TRIAL DIVISION

:
 :
 : MARCH TERM, 2017
 : NO.: 00712

:
 :
 : JURY TRIAL DEMANDED
 :
 :
 :

MOTION TO ENFORCE SUBPOENA

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively “the Roosevelt Defendants”), by and through their undersigned attorneys, hereby move the Court to enter an Order pursuant to Pa. R. Civ. P. 4019, to enforce the Roosevelt Defendants’ subpoena and command the Joseph J. Peters Institute (“JJPI”) to produce requested documents. In support of this motion, the Roosevelt Defendants aver as follows:

1. Plaintiff commenced this civil action on March 10, 2017, alleging violations of Pennsylvania’s Human Trafficking Law and asserting negligence claims against the Roosevelt Defendants and Alpha-Centurion Security, Inc.

2. In her Complaint, Plaintiff alleges that from 2013 through 2014, she was “recruited, enticed, solicited, harbored, and/or transported to engage in commercial sex acts” on the Roosevelt Defendants’ premises on a “regular, consistent and/or repeated basis.” Plaintiff alleges that during this time period, she occupied approximately half of the rooms at the Roosevelt Inn.

3. Plaintiff’s allegations place a number of facts at issue, including, but not limited to: 1) whether Plaintiff was trafficked; and, if she was trafficked 2) whether she was trafficked on the Roosevelt Defendants’ premises; and, if so 3) when she was trafficked on said premises.

4. To date, Plaintiff has failed to identify a single calendar day that she was at the Roosevelt Inn.

5. During the course of discovery, Plaintiff identified JJPI as an organization with both knowledge of her alleged trafficking experiences and from whom she received treatment as a result of those experiences.

6. On March 27, 2018, the Roosevelt Defendants served the parties with a Notice of Intent to Issue Subpoena to Produce Documents or Things for Discovery Pursuant to Rule 4009.22 directed to JJPI (the “Notice”), seeking information related to Plaintiff’s treatment. *See* Notice attached as Exhibit “A.”

7. No party objected to the Notice and the subpoena was served on JJPI.

8. However, on May 10, 2018, JJPI advised that it would not comply with the subpoena and required a Court order to release the requested records. *See* Correspondence from the Roosevelt Defendants' litigation support company, attached as Exhibit "B."

9. As of the date of this motion, JJPI has produced no documents.

10. Therefore, the Roosevelt Defendants require an Order from this Court pursuant to Pa.R.C.P. 4019 compelling JJPI to produce the requested documents.

WHEREFORE, the Roosevelt Defendants respectfully request the Court enter an Order pursuant to Pa.R.C.P. 4019 enforcing the subpoena and commanding JJPI to produce the requested documents at the offices of the Roosevelt Defendants' counsel within ten (10) days.

BLANK ROME LLP

/s/ Daniel E. Oberdick

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309676)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 30, 2018

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
Attorney Bar I.D. No.: 57686
James J. Quinlan, Esquire
Attorney Bar I.D. No.: 200944
Justina L. Byers, Esquire
Attorney Bar I.D. No.: 76773
Daniel E. Oberdick, Esquire
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Email: palmer@blankrome.com
quinlan@blankrome.com
byers@blankrome.com
doberdick@blankrome.com

*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

**DEFENDANTS ROOSEVELT INN LLC, ET AL.’S MEMORANDUM OF LAW
IN SUPPORT OF THEIR MOTION TO ENFORCE SUBPOENA**

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel (hereinafter collectively “the Roosevelt Defendants”), by their undersigned attorneys, hereby file this memorandum of law in support of their motion to enforce subpoena and command the Joseph J. Peters Institute (“JJPI”) to produce requested documents (the “Motion”).

I. FACTUAL AND PROCEDURAL BACKGROUND

Plaintiff commenced this civil action on March 10, 2017, alleging violations of Pennsylvania’s Human Trafficking Law and asserting negligence claims against the Roosevelt Defendants and Alpha-Centurion Security, Inc. In her Complaint, Plaintiff alleges that from 2013 through 2014, she was “recruited, enticed, solicited, harbored, and/or transported to engage in commercial sex acts” on the Roosevelt Defendants’ premises on a “regular, consistent and/or repeated basis.” Plaintiff alleges that during this time period, she occupied approximately half of the rooms at the Roosevelt Inn.

Plaintiff’s allegations place a number of facts at issue, including, but not limited to: 1) whether Plaintiff was trafficked; and, if she was trafficked 2) whether she was trafficked on the Roosevelt Defendants’ premises; and, if so 3) when she was trafficked on said premises. To date, Plaintiff has failed to identify a single calendar day that she was at the Roosevelt Inn. During the course of discovery, Plaintiff identified JJPI as an organization with both knowledge of her alleged trafficking experiences and from whom she received treatment as a result of those experiences.

On March 27, 2018, the Roosevelt Defendants served the parties with a Notice of Intent to Issue Subpoena to Produce Documents or Things for Discovery Pursuant to Rule 4009.22 directed to JJPI (the “Notice”), seeking information related to Plaintiff’s treatment. *See* Notice attached as Exhibit “A.” No party objected to the Notice and the subpoena was served on JJPI.

However, on May 10, 2018, JJPI advised that it would not comply with the subpoena and required a Court order to release the requested records. *See* Correspondence from the Roosevelt

Defendants' litigation support company, attached as Exhibit "B." As of the date of this filing, JJPI has produced no documents.

II. QUESTION INVOLVED

1. Should this Honorable Court enter an Order to enforce the subpoena directed to the Joseph J. Peters Institute where no party has filed objections to the subpoena and because the Joseph J. Peters Institute refuses to produce the requested documents absent a Court Order?

SUGGESTED ANSWER: Yes.

III. ARGUMENT

A. Legal Standard

Pa.R.C.P. 4003.1 of the Pennsylvania Rules of Civil Procedure specifically permits a party to an action to obtain information, documents and things through discovery. In relevant part, the rule states:

(a) ... a party may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action, whether it relates to the claim or defense of the party seeking discovery or to the claim or defense of any other party, including the existence, description, nature, content, custody, condition and location of any books, documents, or other tangible things and the identify and location of persons having knowledge of any discoverable matter.

Pa.R.C.P. 4003.1(a).

Significantly, the scope of allowable discovery under Pa.R.C.P. 4003.1 is far reaching. Pa.R.C.P. 4009.1 articulates how a party may acquire this information from a non-party through the issuance of subpoenas:

(a) *Any party may serve ... a subpoena upon a person not a party pursuant to Rules 4009.21 through 4009.27* to produce and permit the requesting party, or someone acting on the party's behalf, to

inspect and copy any designated documents (including writings, drawings, graphs, charts, photographs, and electronically stored information), or to inspect, copy, test or sample any tangible things or electronically stored information, which constitute or contain matters within the scope of Rules 4003.1 through 4003.6 inclusive and which are in the possession, custody or control of the party or person upon whom the request or subpoena is served, and may do so one or more times.

Pa.R.C.P. 4009.1(a) (emphasis added).

As discussed, *infra*, the information the Roosevelt Defendants seek to obtain from JJPI pursuant to the instant subpoena with which JJPI refuses to comply, falls precisely within the definition of obtainable discovery provided by Pa.R.C.P. 4003.1(a). Pursuant to Pa.R.C.P. 4019(a)(1)(vii), the court, in response to a motion, may make an appropriate order where a “party or person otherwise fails to make discovery[.]” Accordingly, the Roosevelt Defendants now file the instant motion seeking an order enforcing the subpoena directed to JJPI and compelling JJPI to produce the requested documents and things.

B. An Order Should be Entered Enforcing the Subpoena Directed to JJPI

In response to a properly served subpoena to which no party has filed objections, JJPI advised that it was unwilling to provide the requested discovery requested by the Roosevelt Defendants. Despite the Pennsylvania Rules of Civil Procedure specifically permitting the Roosevelt Defendants to seek the requested discovery and allowing JJPI to produce said discovery without a Court order, JJPI has nevertheless refused to comply with the subpoena. In fact, JJPI has advised that it refuses to comply with the Roosevelt Defendants’ subpoena without an order from this Court compelling them to do so. *See* Exhibit “B.”

As this Court is well aware, a party is entitled to seek information relevant to the subject matter of the lawsuit if the subpoena appears reasonably calculated to lead to the discovery of

admissible evidence. *Miller v. Grunfelder*, No. 12726 CIVIL 2008, 2013 Pa. Dist. & Cnty. Dec. Lexis 416, at *7 (Pa. D. & C. July 12, 2013). “It is well established that the fundamental consideration in determining the admissibility of evidence is whether the proffered evidence is relevant to the fact sought to be proved. Evidence is relevant if it tends to make a fact at issue more or less probable.” *Martin v. Soblotney*, 502 Pa. 418, 422 (Pa. 1983) (citation omitted). Further, “Pennsylvania [courts] find[] evidence relevant ‘when it tends to establish facts in issue,’ or when it ‘in some degree advances the inquiry and thus has probative value[.]’” *Whistler Sportswear, Inc. v. Rullo*, 289 Pa. Super. 230, 243 (Pa. Super. 1981).

Here, the Roosevelt Defendants’ subpoena should be enforced as the information sought from JJPI is certainly relevant to the issues being litigated in this case – whether Plaintiff was trafficked at the Roosevelt Inn and, if so, when Plaintiff was trafficked. And, discovery exchanged to this point only further substantiates the Roosevelt Defendants’ entitlement to obtain documents and information concerning Plaintiff’s whereabouts during the time period alleged because, to date, Plaintiff has failed to identify a single calendar day that she was allegedly at the Roosevelt Inn. Clearly, all of the categories of information requested relate to Plaintiff’s whereabouts, are germane to the claims asserted in Plaintiff’s Complaint and lie precisely within the scope of obtainable discovery articulated in Pa.R.C.P. 4003.1 (a). Certainly, the requests are all probative of Plaintiff’s claims and resultant damages. An Order should therefore be entered enforcing the Roosevelt Defendants’ subpoena and compelling JJPI to produce the requested discovery.

IV. RELIEF REQUESTED

In light of the above facts, and pursuant to Pa.R.Civ.P. 40019, the Roosevelt Defendants respectfully request this Court enter the attached Order to Enforce Subpoena and compel the Joseph J. Peters Institute to produce the requested discovery.

BLANK ROME LLP

/s/ Daniel E. Oberdick

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309676)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 30, 2018

CERTIFICATE OF SERVICE

I, Daniel E. Oberdick, Esquire, hereby certify that, on this 30th day of May 2018, I caused a true and correct copy of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Enforce Subpoena and accompanying memorandum of law to be served via the Court's electronic filing system and/or electronic mail upon the following:

Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

*Attorneys for Plaintiff,
M.B., minor by her Guardian, William A. Calandra, Esquire*

Thomas P. Wagner, Esquire
Robert W. Stanko, Esquire
Melanie J. Foreman, Esquire
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103

*Attorneys for Defendant,
Alpha-Centurion Security, Inc.*

/s/ Daniel E. Oberdick
DANIEL E. OBERDICK

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

ORDER

AND NOW, this _____ day of _____, 2018, upon consideration of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Enforce Subpoena, it is hereby ORDERED that said Motion is GRANTED.

The Joseph J. Peters Institute is hereby commanded to produce the documents requested by subpoena, at the offices of Defendants' counsel, Blank Rome LLP, One Logan Square, Philadelphia, PA 19103, within ten (10) days of the date of this Order, or appropriate sanctions shall be imposed upon the Joseph J. Peters Institute upon application to the Court.

BY THE COURT:

J.

Discovery deadline: October 1, 2018

BLANK ROME LLP

BY: Grant S. Palmer, Esquire
Attorney Bar I.D. No.: 57686
James J. Quinlan, Esquire
Attorney Bar I.D. No.: 200944
Justina L. Byers, Esquire
Attorney Bar I.D. No.: 76773
Daniel E. Oberdick, Esquire
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quinlan@blankrome.com
byers@blankrome.com
doberdick@blankrome.com

*Attorneys for Defendants,
Roosevelt Inn LLC d/b/a Roosevelt Inn and
Roosevelt Inn Café, Roosevelt Motor Inn, Inc.
d/b/a Roosevelt Motor Inn,
UFVS Management Company, LLC and
Yagna Patel*

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

ATTORNEY CERTIFICATION OF GOOD FAITH

The undersigned counsel for movant hereby certifies and attest that:

☒a. He or she has had the contacts described below with opposing counsel or unrepresented party regarding discovery matter contained in the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so without Court intervention.

Defendants' counsel served a subpoena to produce documents and things on the Joseph J. Peters Institute. On May 10, 2018, Joseph J. Peters advised that they would not produce the requested records without a court order.

☐ b. He or she was unsuccessful in actually contacting opposing counsel or unrepresented party in an attempt to resolve the discovery dispute(s) despite his or her good faith efforts to do so.

CERTIFIED TO THE COURT BY:

BLANK ROME LLP

/s/ Daniel E. Oberdick

Grant S. Palmer (PA ID# 57686)

James J. Quinlan (PA ID# 200944)

Justina L. Byers (PA ID# 76773)

Daniel E. Oberdick (PA ID# 309676)

BLANK ROME LLP

One Logan Square

130 N. 18th Street

Philadelphia, PA 19103

(215) 569-5500

Dated: May 30, 2018

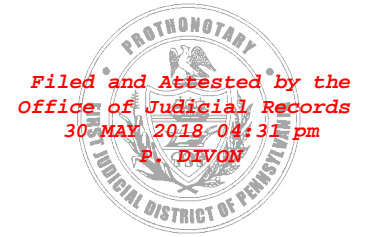


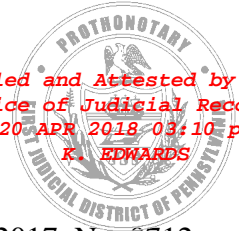
EXHIBIT A

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL

Court of Common Pleas

Filed and Attested by the
Office of Judicial Records
20 APR 2018 03:10 pm
K. EDWARDS



vs.

Roosevelt Inn LLC ETAL

Case Number: March Term, 2017, No. 0712

CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 04/20/2018

Litigation Solutions, LLC on behalf of

Daniel Oberdick

Attorney for the Defendant

CC:

Daniel Oberdick
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Daniel Oberdick _____

Signature: Litigation Solutions, LLC

Name: Litigation Solutions, LLC

Attorney No. (if applicable): _____

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

B. ETAL
vs.
Roosevelt Inn LLC ETAL

Court of Common Pleas

March Term, 2017, No. 0712

**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21**

Provider:	Record Type:
Robert Beason	Miscellaneous
Joseph J. Peters Institute	Medical
Kelly Mahon Beason	Miscellaneous
Arthur Powell	Miscellaneous

TO: Nadeem Bezar, Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 03/27/2018
CC: Daniel Oberdick of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf of:
Daniel Oberdick
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

COUNSEL LISTING FOR B. ETAL VS. ROOSEVELT INN LLC ETAL

County of Philadelphia Court of Common Pleas

Counsel	Firm	Counsel Type
Bezar, Esquire, Nadeem	1525 Locust Street Philadelphia, PA 19102 P: 215-772-1000 F: 215-772-1005	Opposing Counsel



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: Joseph J. Peters Institute

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Daniel Oberdick, Esquire

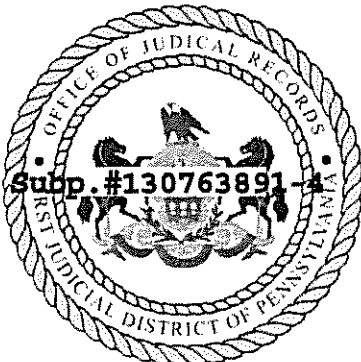
Date: March 27, 2018

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

Joseph J. Peters Institute
1211 Chestnut Street 5th Floor
Philadelphia PA 19107

Subject: Beason, Madison

Requested Items:

Please Remit: Any and all records related to the subject above, including but not limited to: Service Records; Treatment Records; Handwritten Notes; E-Mail communication regarding same.

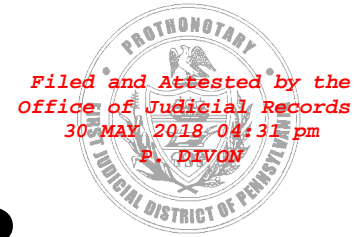


EXHIBIT B

From: Beth Benson [mailto:bbenson@litsol.com]
Sent: Thursday, May 10, 2018 12:41 PM
To: Hassett, Susan M. <Hassett@BlankRome.com>
Subject: Beason, Madison; REDACTED

Good Afternoon;

I just received a call back from Joseph J Peters Institute regarding the request for records and was advised by Dr. Julie Alexander REDACTED that they are going to require a court order in order to release the records.

Please advise if you would like for us to place the request on hold or cancel the request until your office is able to obtain the court order.

Thanks,

Subject: Beason, Madison

If you have any questions or concerns, please contact me at bbenson@litsol.com.

Thank you,

Beth Benson
Litigation Solutions, Inc.

CONFIDENTIALITY NOTICE: The information transmitted in this email and any attachments is intended only for the person or entity to which it is addressed and may contain confidential and/or privileged information. Any review, retransmission, dissemination or other use of or taking of any action in reliance upon this information by person or entities other than the intended recipient is prohibited. If the reader of this message is not the intended recipient, or an employee or agent responsible for delivering this message to the intended recipient, you are thereby notified that any dissemination, disclosure, distribution or copying of this communication is strictly prohibited. You may not copy, publish, or use it in any way and you should notify Litigation Solutions immediately by replying to this message and deleting it from your system.

#43

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017

NO.: 00712

JURY TRIAL DEMANDED

NOTION DELETED

MAY 22 2018

UNCONTESTED

ORDER

AND NOW, this ²² day of MAY 2018, upon consideration of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Overrule Minor Plaintiff M.B.'s Objections to Subpoena, and any response thereto, it is hereby **ORDERED** that Minor Plaintiff M.B.'s Objections are **OVERRULED**. It is further **ORDERED** that Defendants may serve the proposed subpoenas on Minor Plaintiff M.B.'s mother, father and brother.

B. Etal Vs Roosevelt Inn Llc Etal-ORDER



17030071200059

BY THE COURT:

SR New

.J

Discovery End Date: October 1, 2018

DOCKETED
MAY 23 2018
L. PACETTI

Case ID: 170300712

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

**MINOR-PLAINTIFF M.B.'S MOTION TO COMPEL COMPLIANCE WITH
 SUBPOENA DIRECTED TO NEW DIRECTIONS TREATMENT SERVICES**

1. Minor-Plaintiff M.B., by and through counsel, Kline & Specter, P.C., requests this Honorable Court compel New Directions Treatment Services to comply with a Subpoena served upon it and in support thereof states the following:

2. This case involves the human sex trafficking of Minor-Plaintiff M.B. at the Roosevelt Inn at 7630 Roosevelt Boulevard, Philadelphia, PA 19152.

3. On October 5, 2017, Minor-Plaintiff's counsel served defense counsel with a Notice of Intent to Serve a Subpoena on New Directions Treatment Services with a copy of the proposed Subpoena attached. See October 5, 2017, letter to defense counsel attached as Exhibit "A", and Notice of Intent with Subpoena and Addendum, attached as Exhibit "B".

4. The Subpoena requested "any and all records pertaining to [M.B.], including any and all medical records, therapy records, counseling records, statements, recordings, videos,

DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding [M.B.]”. See Ex. “B”.

5. Defense counsel did not object to the Notice of Intent to Serve a Subpoena on New Directions Treatment Services.

6. On November 8, 2017, Minor-Plaintiff filed a Certificate of Prerequisite to Service of a Subpoena Pursuant to Rule 4009.21. See Certificate Prerequisite, attached as Exhibit “C”.

7. The Subpoena with Addendum were served on New Directions Treatment Services.

8. On February 9, 2018, Minor-Plaintiff sent a follow-up letter to New Directions Treatment Services. See February 9, 2018, letter to New Directions Treatment Services as Exhibit “D”.

9. To date, New Directions Treatment Services has failed to comply with the Subpoena.

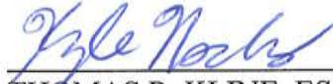
10. New Directions Treatment Services has not filed objections to the Subpoena and any objections filed in the future would be untimely.

11. The requested information is relevant to Minor-Plaintiff’s case and Minor-Plaintiff will be unfairly prejudiced if the requested documents are not produced.

WHEREFORE, Minor-Plaintiff respectfully requests this Court enter the attached proposed Order compelling New Directions Treatment Services to comply with Minor-Plaintiff's Subpoena.

Respectfully submitted,

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

To: New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

Please take notice that the following Motion:

- ☒ Minor-Plaintiff's Motion to Compel Compliance with Subpoena directed to New
Directions Treatment Services
☐ Defendant's Motion _____

will be presented to the Court on the date and time provided electronically by the Court in the Court Room listed on the electronic confirmation, City Hall, Philadelphia, PA. See electronic confirmation to be provided.

By:



KYLE B. NOCHO, ESQUIRE

Attorney I.D. No. 319270

Telephone Number: 215.772-1000

Address: Kline & Specter, P.C.

1525 Locust Street, Philadelphia, PA 19102

Date: June 4, 2018

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to New Directions Treatment Services was filed with the Court on June 4, 2018 and served by electronic filing upon the following counsel of record:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103

President of Defendant Alpha-Centurion Security, Inc.

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to New Directions Treatment Services was served by registered, return receipt mail on the following upon acceptance of electronic filing:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

By: 
KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Dated: June 4, 2018

Attorney Certification of Good Faith

Pursuant to Phila.Civ.R. * 208.2(e)

The undersigned counsel for Movant hereby certifies and attests that:

☒ a. He or she has had the contacts described below with opposing counsel about the subject matter of the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite all counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so.

Description:

Minor-Plaintiff's counsel sent follow up correspondence to New Directions Treatment Services, to no avail.

☐ b. He or she has made good faith but unsuccessful efforts described below to contact opposing counsel or unrepresented party in an effort to resolve the discovery dispute(s).

CERTIFIED TO THE COURT BY:



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to New Directions Treatment Services are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

EXHIBIT A

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

October 5, 2017

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Re: M.B. v. Roosevelt Inn LLC, et al.
Philadelphia CCP, March Term, 2017, No. 00712

Dear Counsel:


Enclosed please find Plaintiff's Notice of Intent to serve a Subpoena addressed to the following:

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

Please advise if you agree to waive the 20 day waiting period.

Thank you.

Very truly yours,



Kyle B. Nocho

KBN/dd
Encl.

EXHIBIT B

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

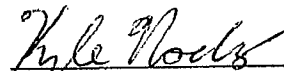
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
 THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- | | |
|---|--|
| • The Villa | • Tabor Children's Services |
| • VisionQuest | • First Home Care |
| • Joseph J. Peters Institute | • Asociacion Puertorriquenos en Marcha, Inc. ("APM") |
| • Sobriety Through Outpatient Philadelphia | • Philadelphia Department of Human Services |
| • New Directions Treatment Services | |
| • Visiting Nurse Association Community Services | |

KLINE & SPECTER, P.C.

BY:


 KYLE B. NOCHO, ESQUIRE
 Attorney for Minor-Plaintiff

Date: 10/5/2017

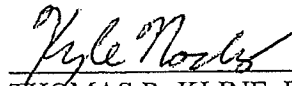
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: NEW DIRECTIONS TREATMENT SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: NEW DIRECTIONS TREATMENT SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

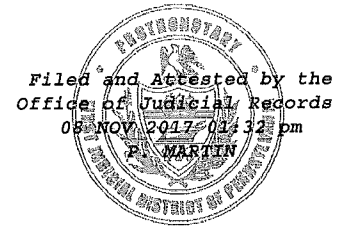
You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .

EXHIBIT C

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
 PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY:

Kyle Nocho

KYLE B. NOCHO, ESQUIRE
 Attorney for Plaintiffs

Date: 11/8/17

Case ID: 170300712


CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 11/8/17



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	


**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- | | |
|---|--|
| • The Villa | • Tabor Children's Services |
| • VisionQuest | • First Home Care |
| • Joseph J. Peters Institute | • Asociacion Puertorriquenos en Marcha, Inc. ("APM") |
| • Sobriety Through Outpatient Philadelphia | • Philadelphia Department of Human Services |
| • New Directions Treatment Services | |
| • Visiting Nurse Association Community Services | |

KLINE & SPECTER, P.C.

BY:


 KYLE B. NOCHO, ESQUIRE
 Attorney for Minor-Plaintiff

Date: 10/5/2017

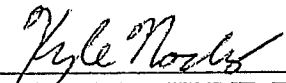
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

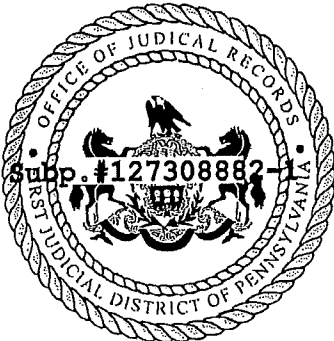
Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. *(Date of Subpoena)*

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:
M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISIONQUEST
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street PHILADELPHIA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISIONQUEST
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. *(Date of Subpoena)*

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

VISIONQUEST
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding

M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: JOSEPH J. PETERS INSTITUTE
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

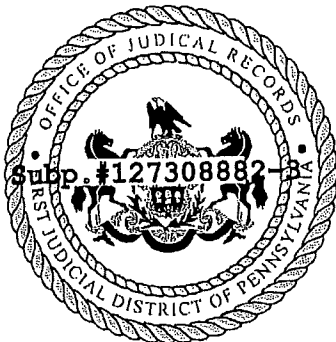
Date: October 05, 2017

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: JOSEPH J. PETERS INSTITUTE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

JOSEPH J. PETERS INSTITUTE
100 South Broad Street, 17th Floor.
Philadelphia, PA 19110
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Sobriety Through Outpatient Philadelphia ("STOP")
2534-326 N. Broad Street, STE 200
Philadelphia, PA 19132
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to [REDACTED] M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding [REDACTED] M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: NEW DIRECTIONS TREATMENT SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

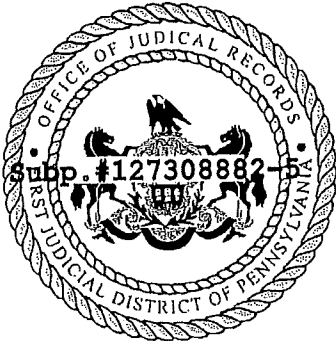
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: NEW DIRECTIONS TREATMENT SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Visiting Nurse Association Community Services, Inc.
1421 Highland Avenue
Abington, PA 19001
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: TABOR CHILDREN'S SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: TABOR CHILDREN'S SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TABOR CHILDREN'S SERVICES
57 E. Armat Street
Philadelphia, PA 19144
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: FIRST HOME CARE
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: Kline & Specter, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

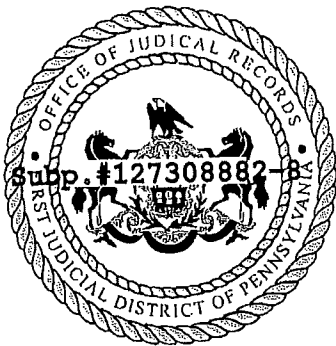
Date: October 05, 2017

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B, ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: FIRST HOME CARE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

**FIRST CARE HOME
4641 Roosevelt Boulevard
Philadelphia, PA 19124
Attn: Custodian of Records**

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

APM

1900 North 9th Street

Philadelphia, PA 19122

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

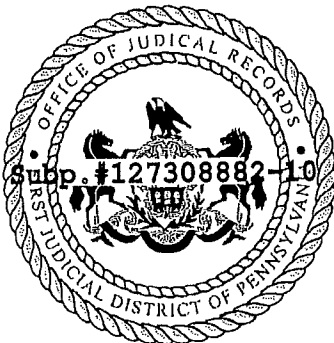
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

PHILADELPHIA DEPARTMENT OF HUMAN SERVICES

1515 Arch Street, 16th Floor

Philadelphia, PA 19102

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are ordered by the court to produce the following documents or things: any and all records pertaining to M.B. ; DOB: 9/3/1999, including but not limited to any and all CUA records, correspondence to and/or from other agencies or individuals, child placement, child permanency plans, case notes, court orders, investigation reports, medical records including psychiatric treatment records, evaluation reports and counseling records, and any other document to consist of your entire file regarding

M.B.

EXHIBIT D

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

February 9, 2018

Via First Class Mail

New Direction Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

**Re: M.B., a minor v. Roosevelt Inn, LLC et al.
Philadelphia CCP, March Term, 2017, No. 00712**

Dear Custodian of Records:

On November 8, 2017, we served New Direction Treatment Services with a Subpoena to Produce Documents in connection with the above-captioned matter (see attached). Pursuant to the Pennsylvania Rules of Civil Procedure, the requested records should have been produced no later than November 28, 2017. To date, there has been no response to Plaintiff's subpoena.

Please forward the subpoenaed records to my attention immediately, to avoid having a motion filed against you. Please also forward the completed Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23 and return to me along with the requested records

Thank you.

Very truly yours,



KYLE B. NOCHO

KBN/dd
Encl.

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

Filed and Attested by the
Office of Judicial Records
04 JUN 2018 12:14 pm
M. TIERNEY

ORDER

AND NOW, this day of , 2018, upon consideration of
Minor-Plaintiff's Motion to Compel Compliance with Subpoena Directed to Sobriety Through
Outpatient Philadelphia and any response thereto, it is hereby;

ORDERED and **DECREED** that Minor-Plaintiff's Motion is **GRANTED** and Sobriety
Through Outpatient Philadelphia shall produce all documents in its possession that are
responsive to Minor-Plaintiff's Subpoena within ten (10) days of the date of this Order. Failure
to comply with this Order may result in sanctions upon application to the Court.

BY THE COURT:

J.

DISCOVERY DEADLINE: OCTOBER 1, 2018

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

**MINOR-PLAINTIFF M.B.'S MOTION TO COMPEL COMPLIANCE WITH
 SUBPOENA DIRECTED TO SOBRIETY THROUGH OUTPATIENT PHILADELPHIA**

1. Minor-Plaintiff M.B., by and through counsel, Kline & Specter, P.C., requests this Honorable Court compel Sobriety Through Outpatient Philadelphia to comply with a Subpoena served upon it and in support thereof states the following:

2. This case involves the human sex trafficking of Minor-Plaintiff M.B. at the Roosevelt Inn at 7630 Roosevelt Boulevard, Philadelphia, PA 19152.

3. On October 5, 2017, Minor-Plaintiff's counsel served defense counsel with a Notice of Intent to Serve a Subpoena on Sobriety Through Outpatient Philadelphia with a copy of the proposed Subpoena attached. See October 5, 2017, letter to defense counsel attached as Exhibit "A", and Notice of Intent with Subpoena and Addendum, attached as Exhibit "B".

4. The Subpoena requested "any and all records pertaining to [M.B.], including any and all medical records, therapy records, counseling records, statements, recordings, videos,

DVDs, forensic interviews and/or investigative reports, and any other documents to consist of your entire file regarding [M.B.]” See Ex. “B”.

5. Defense counsel did not object to the Notice of Intent to Serve a Subpoena on Sobriety Through Outpatient Philadelphia.

6. On November 8, 2017, Minor-Plaintiff filed a Certificate of Prerequisite to Service of a Subpoena Pursuant to Rule 4009.21. See Certificate Prerequisite, attached as Exhibit “C”.

7. The Subpoena with Addendum were served on Sobriety Through Outpatient Philadelphia.

8. On February 9, 2018, Minor-Plaintiff sent a follow-up letter to Sobriety Through Outpatient Philadelphia. See February 9, 2018, letter to Sobriety Through Outpatient Philadelphia as Exhibit “D”.

9. To date, Sobriety Through Outpatient Philadelphia has failed to comply with the Subpoena.

10. Sobriety Through Outpatient Philadelphia has not filed objections to the Subpoena and any objections filed in the future would be untimely.

11. The requested information is relevant to Minor-Plaintiff’s case and Minor-Plaintiff will be unfairly prejudiced if the requested documents are not produced.

WHEREFORE, Minor-Plaintiff respectfully requests this Court enter the attached proposed Order compelling Sobriety Through Outpatient Philadelphia to comply with Minor-Plaintiff's Subpoena.

Respectfully submitted,

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

To: Sobriety Through Outpatient Philadelphia
2534 North Broad Street, Suite 200
Philadelphia, PA 19132
Attn: Custodian of Records

Please take notice that the following Motion:

- ☒ Minor-Plaintiff's Motion to Compel Compliance with Subpoena directed to
Sobriety Through Outpatient Philadelphia
☐ Defendant's Motion _____

will be presented to the Court on the date and time provided electronically by the Court in the Court Room listed on the electronic confirmation, City Hall, Philadelphia, PA. See electronic confirmation to be provided.

By: _____



KYLE B. NOCHO, ESQUIRE

Attorney I.D. No. 319270

Telephone Number: 215.772-1000

Address: Kline & Specter, P.C.

1525 Locust Street, Philadelphia, PA 19102

Date: June 4, 2018

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to Sobriety Through Outpatient Philadelphia was filed with the Court on June 4, 2018 and served by electronic filing upon the following counsel of record:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103
President of Defendant Alpha-Centurion Security, Inc.

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to Sobriety Through Outpatient Philadelphia was served by registered, return receipt mail on the following upon acceptance of electronic filing:

Sobriety Through Outpatient Philadelphia
2534 North Broad Street, Suite 200
Philadelphia, PA 19132
Attn: Custodian of Records

By: 
KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Dated: June 4, 2018

Attorney Certification of Good Faith

Pursuant to Phila.Civ.R. * 208.2(e)

The undersigned counsel for Movant hereby certifies and attests that:

☒ a. He or she has had the contacts described below with opposing counsel about the subject matter of the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite all counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so.

Description:

Minor-Plaintiff's counsel sent follow up correspondence to Sobriety Through Outpatient Philadelphia, to no avail.

☐ b. He or she has made good faith but unsuccessful efforts described below to contact opposing counsel or unrepresented party in an effort to resolve the discovery dispute(s).

CERTIFIED TO THE COURT BY:



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to Sobriety Through Outpatient Philadelphia are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

EXHIBIT A

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

October 5, 2017

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Re: M.B. v. Roosevelt Inn LLC, et al.
Philadelphia CCP, March Term, 2017, No. 00712

Dear Counsel:

Enclosed please find Plaintiff's Notice of Intent to serve a Subpoena addressed to the following:

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

Please advise if you agree to waive the 20 day waiting period.

Thank you.

Very truly yours,



Kyle B. Nocho

KBN/dd
Encl.

EXHIBIT B

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Minor-Plaintiff

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
and
ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
and
UFVS MANAGEMENT COMPANY, LLC
and
YAGNA PATEL
Defendants

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED


**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

KLINE & SPECTER, P.C.

BY:


KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Date: 10/5/2017

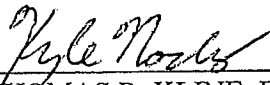
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Sobriety Through Outpatient Philadelphia ("STOP")
2534-326 N. Broad Street, STE 200
Philadelphia, PA 19132
Attn: Custodian of Records

M.B.

DOB: [REDACTED]

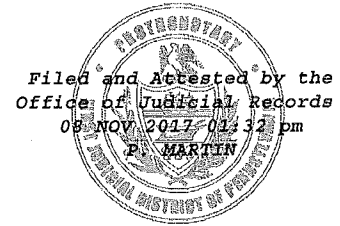
You are to provide any and all records pertaining to [REDACTED] M.B., including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding [REDACTED] M.B.

EXHIBIT C

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
 PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY:

Kyle Nocho
 KYLE B. NOCHO, ESQUIRE
 Attorney for Plaintiffs

Date: 11/8/17

Case ID: 170300712


CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 11/8/17



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Minor-Plaintiff

M.B., minor by her Guardian,
 WILLIAM A. CALANDRA, ESQUIRE
 Plaintiff,

V.

ROOSEVELT INN LLC
 d/b/a ROOSEVELT INN and
 ROOSEVELT INN CAFE
 and
 ROOSEVELT MOTOR INN, INC.
 d/b/a ROOSEVELT MOTOR INN
 and
 UFVS MANAGEMENT COMPANY, LLC
 and
 YAGNA PATEL
 Defendants

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
 MARCH TERM, 2017
 NO.: 00712

JURY TRIAL DEMANDED


**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
 THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

KLINE & SPECTER, P.C.

BY:


 KYLE B. NOCHO, ESQUIRE
 Attorney for Minor-Plaintiff

Date: 10/5/2017

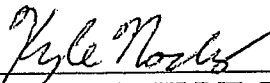
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Kyle B. Nocho

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:
M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISIONQUEST
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street PHILADELPHIA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

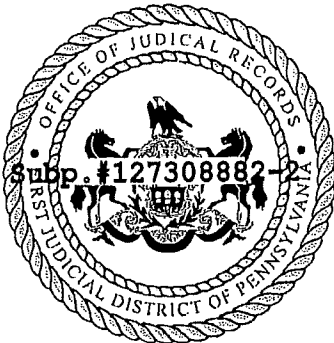
Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISIONQUEST
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

VISIONQUEST
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding

M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: JOSEPH J. PETERS INSTITUTE
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: JOSEPH J. PETERS INSTITUTE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

JOSEPH J. PETERS INSTITUTE
100 South Broad Street, 17th Floor.
Philadelphia, PA 19110
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

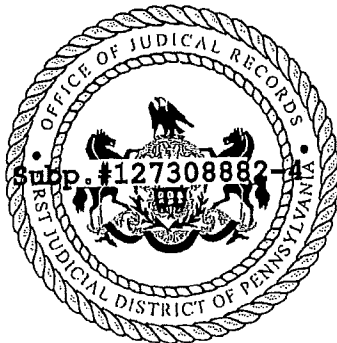
Name: Nocho, Kyle B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
:
: March Term, 17
:
: No. 00712

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Sobriety Through Outpatient Philadelphia ("STOP")
2534-326 N. Broad Street, STE 200
Philadelphia, PA 19132
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to [REDACTED] M.B., including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding [REDACTED] M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: NEW DIRECTIONS TREATMENT SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

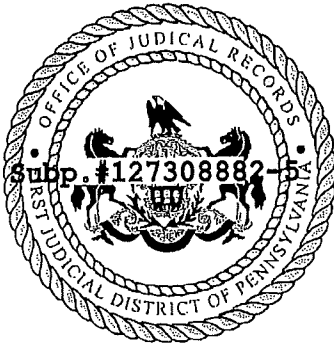
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: NEW DIRECTIONS TREATMENT SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

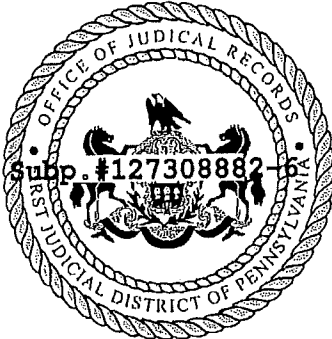
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Visiting Nurse Association Community Services, Inc.
1421 Highland Avenue
Abington, PA 19001
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: TABOR CHILDREN'S SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

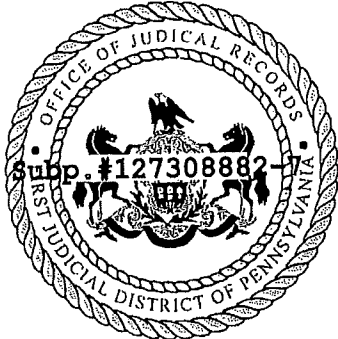
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: TABOR CHILDREN'S SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TABOR CHILDREN'S SERVICES
57 E. Armat Street
Philadelphia, PA 19144
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: FIRST HOME CARE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: Kline & Specter, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

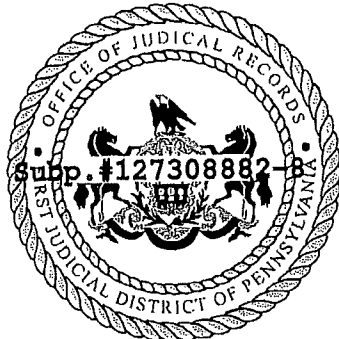
If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
:
: March Term, 17
:
: No. 00712

TO: FIRST HOME CARE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

FIRST CARE HOME
4641 Roosevelt Boulevard
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

APM
1900 North 9th Street
Philadelphia, PA 19122
Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

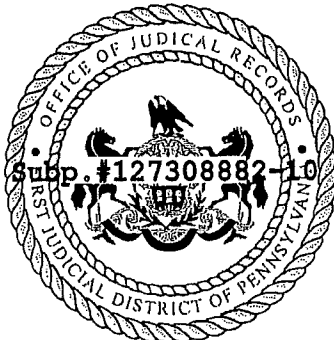
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Date: October 05, 2017



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

PHILADELPHIA DEPARTMENT OF HUMAN SERVICES

1515 Arch Street, 16th Floor

Philadelphia, PA 19102

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are ordered by the court to produce the following documents or things: any and all records pertaining to M.B. ; DOB: 9/3/1999, including but not limited to any and all CUA records, correspondence to and/or from other agencies or individuals, child placement, child permanency plans, case notes, court orders, investigation reports, medical records including psychiatric treatment records, evaluation reports and counseling records, and any other document to consist of your entire file regarding M.B.

EXHIBIT D

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

February 9, 2018

Via First Class Mail

Sobriety Through Outpatient Philadelphia
2534 North Broad Street, Suite 200
Philadelphia, PA 19132
Attn: Custodian of Records

**Re: M.B., a minor v. Roosevelt Inn, LLC et al.
Philadelphia CCP, March Term, 2017, No. 00712**

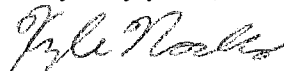
Dear Custodian of Records:

On November 8, 2017, we served Sobriety Through Outpatient Philadelphia ("STOP") with a Subpoena to Produce Documents in connection with the above-captioned matter (see attached). Pursuant to the Pennsylvania Rules of Civil Procedure, the requested records should have been produced no later than November 28, 2017. To date, there has been no response to Plaintiff's subpoena.

Please forward the subpoenaed records to my attention immediately, to avoid having a motion filed against you. Please also forward the completed Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23 and return to me along with the requested records

Thank you.

Very truly yours,


KYLE B. NOCHO

KBN/dd
Encl.

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

Filed and Attested by the
Office of Judicial Records
04 JUN 2018 12:52 pm
M. TIERNEY

ORDER

AND NOW, this day of , 2018, upon consideration of
Minor-Plaintiff's Motion to Compel Compliance with Subpoena Directed to VisionQuest and
any response thereto, it is hereby;

ORDERED and **DECREED** that Minor-Plaintiff's Motion is **GRANTED** and
VisionQuest shall produce all documents in its possession that are responsive to Minor-
Plaintiff's Subpoena within ten (10) days of the date of this Order. Failure to comply with this
Order may result in sanctions upon application to the Court.

BY THE COURT:

J.

DISCOVERY DEADLINE: OCTOBER 1, 2018

Case ID: 170300712

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

**MINOR-PLAINTIFF M.B.'S MOTION TO COMPEL COMPLIANCE WITH
 SUBPOENA DIRECTED TO VISIONQUEST**

1. Minor-Plaintiff M.B., by and through counsel, Kline & Specter, P.C., requests this Honorable Court compel VisionQuest to comply with a Subpoena served upon it and in support thereof states the following:

2. This case involves the human sex trafficking of Minor-Plaintiff M.B. at the Roosevelt Inn at 7630 Roosevelt Boulevard, Philadelphia, PA 19152.

3. On October 5, 2017, Minor-Plaintiff's counsel served defense counsel with a Notice of Intent to Serve a Subpoena on VisionQuest with a copy of the proposed Subpoena attached. See October 5, 2017, letter to defense counsel attached as Exhibit "A", and Notice of Intent with Subpoena and Addendum, attached as Exhibit "B".

4. The Subpoena requested "a complete copy of the entire file pertaining to [M.B.]; and any and all documents you may have relating to [M.B.] including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System,

incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding [M.B.]” See Ex. “B”.

5. Defense counsel did not object to the Notice of Intent to Serve a Subpoena on VisionQuest.

6. On November 8, 2017, Minor-Plaintiff filed a Certificate of Prerequisite to Service of a Subpoena Pursuant to Rule 4009.21. See Certificate Prerequisite, attached as Exhibit “C”.

7. The Subpoena with Addendum were served on VisionQuest.

8. On February 9, 2018, Minor-Plaintiff sent a follow-up letter to VisionQuest. See February 9, 2018, letter to VisionQuest as Exhibit “D”.

9. On February 13, 2018, Minor-Plaintiff’s counsel received a return to sender copy of the February 9, 2018 letter sent to VisionQuest.

10. On February 16, 2018, Minor-Plaintiff followed up with VisionQuest employee Ann Ranalli to obtain the correct address. Minor-Plaintiff also sent a copy of the subpoena requesting Minor-Plaintiff’s records. See February 16, 2018 email attached as Exhibit “E”.

11. To date, VisionQuest has failed to comply with the Subpoena.

12. VisionQuest has not filed objections to the Subpoena and any objections filed in the future would be untimely.

13. The requested information is relevant to Minor-Plaintiff’s case and Minor-Plaintiff will be unfairly prejudiced if the requested documents are not produced.

WHEREFORE, Minor-Plaintiff respectfully requests this Court enter the attached proposed Order compelling VisionQuest to comply with Minor-Plaintiff's Subpoena.

Respectfully submitted,

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

To: VisionQuest
35 Keystone Road
Gouldsboro, PA 18424
Attn: Custodian of Records

Please take notice that the following Motion:

- ☒ Minor-Plaintiff's Motion to Compel Compliance with Subpoena directed to VisionQuest
☐ Defendant's Motion _____

will be presented to the Court on the date and time provided electronically by the Court in the Court Room listed on the electronic confirmation, City Hall, Philadelphia, PA. See electronic confirmation to be provided.

By: Kyle Nocho

Date: June 4, 2018

KYLE B. NOCHO, ESQUIRE
Attorney I.D. No. 319270
Telephone Number: 215.772-1000
Address: Kline & Specter, P.C.
1525 Locust Street, Philadelphia, PA 19102

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to VisionQuest was filed with the Court on June 4, 2018 and served by electronic filing upon the following counsel of record:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103
President of Defendant Alpha-Centurion Security, Inc.

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to VisionQuest was served by registered, return receipt mail on the following upon acceptance of electronic filing:

VisionQuest
35 Keystone Road
Gouldsboro, PA 18424
Attn: Custodian of Records

By: 
KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Dated: June 4, 2018

Attorney Certification of Good Faith

Pursuant to Phila.Civ.R. * 208.2(e)

The undersigned counsel for Movant hereby certifies and attests that:

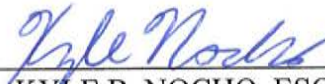
☒ a. He or she has had the contacts described below with opposing counsel about the subject matter of the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite all counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so.

Description:

Minor-Plaintiff's counsel sent follow up correspondence to VisionQuest, to no avail.

☐ b. He or she has made good faith but unsuccessful efforts described below to contact opposing counsel or unrepresented party in an effort to resolve the discovery dispute(s).

CERTIFIED TO THE COURT BY:



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to VisionQuest are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

EXHIBIT A

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

October 5, 2017

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Re: M.B. v. Roosevelt Inn LLC, et al.
Philadelphia CCP, March Term, 2017, No. 00712

Dear Counsel:

Enclosed please find Plaintiff's Notice of Intent to serve a Subpoena addressed to the following:

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

Please advise if you agree to waive the 20 day waiting period.

Thank you.

Very truly yours,



Kyle B. Nocho

KBN/dd
Encl.

EXHIBIT B

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

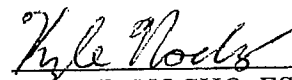
NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- | | |
|---|--|
| • The Villa | • Tabor Children's Services |
| • VisionQuest | • First Home Care |
| • Joseph J. Peters Institute | • Asociacion Puertorriquenos en Marcha, Inc. ("APM") |
| • Sobriety Through Outpatient Philadelphia | • Philadelphia Department of Human Services |
| • New Directions Treatment Services | |
| • Visiting Nurse Association Community Services | |

KLINE & SPECTER, P.C.

BY:


KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Date: 10/5/2017

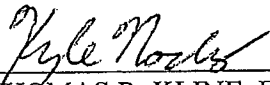
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISIONQUEST
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street PHILADELPHIA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

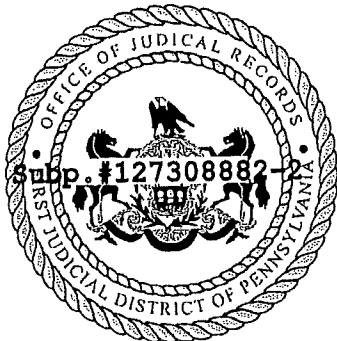
Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISIONQUEST
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

VISIONQUEST
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding

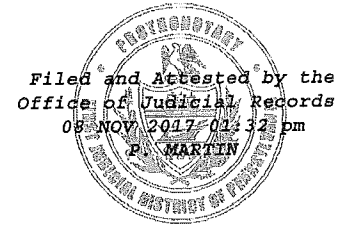
M.B. ,

EXHIBIT C

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000



M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
 PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY:

Kyle Nocho

KYLE B. NOCHO, ESQUIRE
 Attorney for Plaintiffs

Date: 11/8/17

Case ID: 170300712


CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 11/8/17



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
Plaintiff,	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	


**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
 THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- | | |
|---|--|
| • The Villa | • Tabor Children's Services |
| • VisionQuest | • First Home Care |
| • Joseph J. Peters Institute | • Asociacion Puertorriquenos en Marcha, Inc. ("APM") |
| • Sobriety Through Outpatient Philadelphia | • Philadelphia Department of Human Services |
| • New Directions Treatment Services | |
| • Visiting Nurse Association Community Services | |

KLINE & SPECTER, P.C.

BY:


 KYLE B. NOCHO, ESQUIRE
 Attorney for Minor-Plaintiff

Date: 10/5/2017

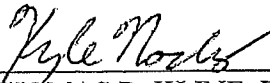
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Kyle B. Nocho

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B, ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:
M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISIONQUEST

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street PHILADELPHIA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Kyle B. Nocho

Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISIONQUEST
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

VISIONQUEST
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding

M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: JOSEPH J. PETERS INSTITUTE
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

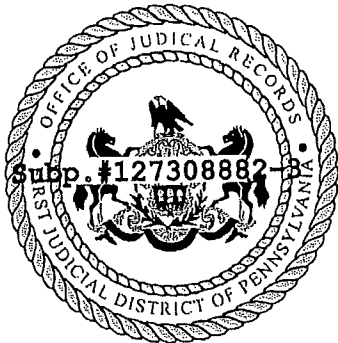
Date: October 05, 2017

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: JOSEPH J. PETERS INSTITUTE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

JOSEPH J. PETERS INSTITUTE
100 South Broad Street, 17th Floor.
Philadelphia, PA 19110
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

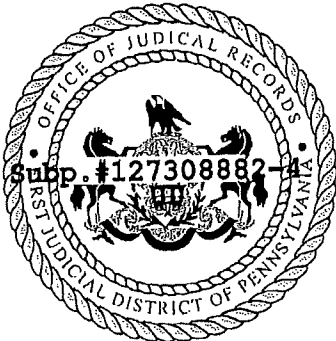
Name: Nocho, Kyle B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Sobriety Through Outpatient Philadelphia ("STOP")
2534-326 N. Broad Street, STE 200
Philadelphia, PA 19132
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to [REDACTED] M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding [REDACTED] M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: NEW DIRECTIONS TREATMENT SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

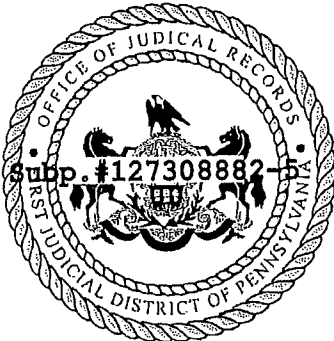
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: NEW DIRECTIONS TREATMENT SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

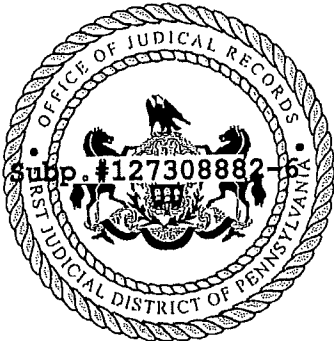
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Visiting Nurse Association Community Services, Inc.
1421 Highland Avenue
Abington, PA 19001
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: TABOR CHILDREN'S SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: TABOR CHILDREN'S SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TABOR CHILDREN'S SERVICES
57 E. Armat Street
Philadelphia, PA 19144
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: FIRST HOME CARE
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: Kline & Specter, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: FIRST HOME CARE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

***Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.***

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. *(Date of Subpoena)*

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

**FIRST CARE HOME
4641 Roosevelt Boulevard
Philadelphia, PA 19124
Attn: Custodian of Records**

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

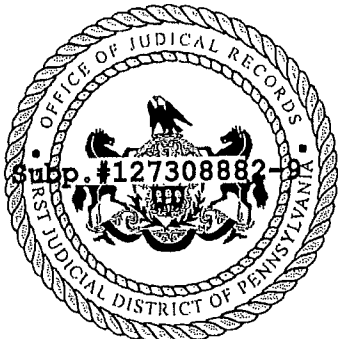
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

APM

1900 North 9th Street

Philadelphia, PA 19122

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

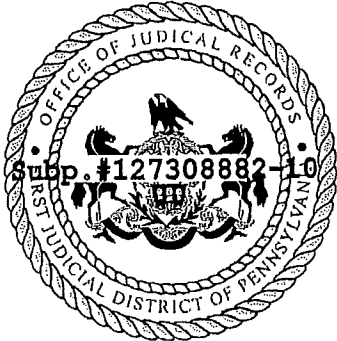
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have
been produced. (Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

PHILADELPHIA DEPARTMENT OF HUMAN SERVICES

1515 Arch Street, 16th Floor

Philadelphia, PA 19102

Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are ordered by the court to produce the following documents or things: any and all records pertaining to M.B. ; DOB: 9/3/1999, including but not limited to any and all CUA records, correspondence to and/or from other agencies or individuals, child placement, child permanency plans, case notes, court orders, investigation reports, medical records including psychiatric treatment records, evaluation reports and counseling records, and any other document to consist of your entire file regarding M.B.

EXHIBIT D

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

February 9, 2018

Via First Class Mail
VisionQuest
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records

Re: M.B., a minor v. Roosevelt Inn, LLC et al.
Philadelphia CCP, March Term, 2017, No. 00712

Dear Custodian of Records:

On November 8, 2017, we served VisionQuest with a Subpoena to Produce Documents in connection with the above-captioned matter (see attached). Pursuant to the Pennsylvania Rules of Civil Procedure, the requested records should have been produced no later than November 28, 2017. To date, there has been no response to Plaintiff's subpoena.

Please forward the subpoenaed records to my attention immediately, to avoid having a motion filed against you. Please also forward the completed Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23 and return to me along with the requested records

Thank you.

Very truly yours,


KYLE B. NOCHO

KBN/dd
Encl.

EXHIBIT E

McCloud, Tyzahvon

From: McCloud, Tyzahvon
Sent: Friday, February 16, 2018 9:42 AM
To: 'ann.ranalli@vq.com'
Cc: Nocho, Kyle
Subject: M [REDACTED] B [REDACTED]
Attachments: Correspondence to Ms. Ann Ranalli.pdf; Subpoena.pdf

Tracking:	Recipient	Delivery
	'ann.ranalli@vq.com'	
	Nocho, Kyle	Delivered: 2/16/2018 9:42 AM

Dear Ms. Ranalli,

I have attached a copy of the follow-up letter and subpoena we sent to your facility on February 9, 2018. To date, we have not received records pursuant to our request. Please advise when we would receive our client's records.

Thank you.

Ty McCloud
Paralegal to Nadeem Bezar, Esq., Emily Marks, Esq.,
and Kyle B. Nocho, Esq.
KLINE & SPECTER, P.C.
1525 Locust Street
Philadelphia, PA 19102
Direct Dial: 215.772.0528
Facsimile: 215.772.1005
www.klinespecter.com

This email message and any attachments are confidential. If you are not the intended recipient, please immediately reply to the sender and delete the message from your email system. Thank you. Privileged Attorney-Client Communication/Attorney's Work Product.

COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL

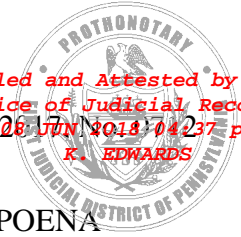
Court of Common Pleas

vs.

Roosevelt Inn LLC ETAL

Case Number: March Term, 2017-018-04237 pm

Filed and Attested by the
Office of Judicial Records
K. EDWARDS



CERTIFICATE PREREQUISITE TO THE SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, Litigation Solutions, LLC ('LSLLC') on behalf of Daniel Oberdick certifies that:

- (1) A notice of intent to serve the subpoena with a copy of the subpoena attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoena is sought to be served;
- (2) A copy of the notice of intent, including the proposed subpoena, is attached to this certificate;
- (3) No objection to the subpoena has been received, and;
- (4) The subpoena which will be served is identical to the subpoena which is attached to the notice of intent to serve the subpoena.

Date: 05/24/2018

Litigation Solutions, LLC on behalf of

Daniel Oberdick

Attorney for the Defendant

CC:

Daniel Oberdick
Blank Rome LLP
130 North 18th St.
One Logan Square
Philadelphia, PA 19103
215-569-5500

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

Submitted by: Daniel Oberdick

Signature: 

Name: Litigation Solutions, LLC

Attorney No. (if applicable): _____

PENNSYLVANIA COURT OF COMMON PLEAS

COUNTY OF PHILADELPHIA

B. ETAL
vs.
Roosevelt Inn LLC ETAL

Court of Common Pleas

March Term, 2017, No. 0712

NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND THINGS FOR DISCOVERY PURSUANT TO
RULE 4009.21

Provider:

Record Type:

R.B.
Joseph J. Peters Institute
K.B.
A.P

Miscellaneous
Medical
Miscellaneous
Miscellaneous

TO: Nadeem Bezar, Esquire

note: please see enclosed list of all other interested counsel

Litigation Solutions, LLC ("LSLLC") on behalf of Daniel Oberdick intends to serve a subpoena identical to the one that is attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If the twenty day notice period is waived or if no objection is made, then the subpoena may be served.

Date of Issue: 03/27/2018

CC: Daniel Oberdick of Blank Rome LLP - Court of Common Pleas

Litigation Solutions, LLC on behalf of:

Daniel Oberdick
Defense

If you have any questions regarding this matter, please contact:
Litigation Solutions, LLC (412.263.5656)
Brentwood Towne Centre
101 Towne Square Way, Suite 251
Pittsburgh, PA 15227

COUNSEL LISTING FOR B. ETAL VS. ROOSEVELT INN LLC ETAL

County of Philadelphia Court of Common Pleas

Counsel

Bezar, Esquire, Nadeem

Firm

1525 Locust Street
Philadelphia, PA 19102
P: 215-772-1000 F: 215-772-1005

Counsel Type

Opposing Counsel

#43

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017

NO.: 00712

JURY TRIAL DEMANDED

MAY 22 2018

UNCONTESTED

ORDER

AND NOW, this 22nd day of MAY 2018, upon consideration of Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Overrule Minor Plaintiff M.B.'s Objections to Subpoena, and any response thereto, it is hereby **ORDERED** that Minor Plaintiff M.B.'s Objections are **OVERRULED**. It is further **ORDERED** that Defendants may serve the proposed subpoenas on Minor Plaintiff M.B.'s mother, father and brother.

B. Etal Vs Roosevelt Inn Llc Etal-ORDER



17030071200059

BY THE COURT:

SR New

J

Discovery End Date: October 1, 2018

DOCKETED
MAY 23 2018
L. PACETTI



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: R.B.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: March 27, 2018

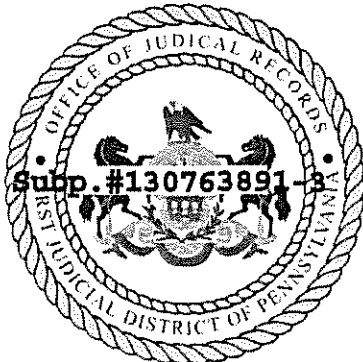
Name: Daniel Oberdick, Esquire

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

R.B.
3479 Emerald Street
Philadelphia PA 19134

Subject: REDACTED

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17
No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: K.B.
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

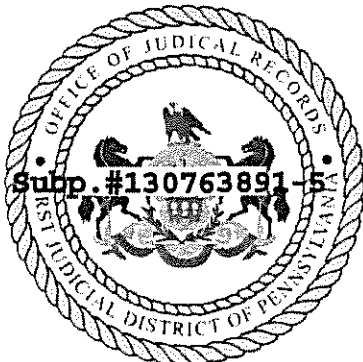
Date: March 27, 2018

Name: Daniel Oberdick, Esquire
Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

K.B.
3479 Emerald Street
Philadelphia PA 19134

Subject: REDACTED

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: A.P

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See attached rider for instructions

at: 101 Towne Square Way Suite 251 Pittsburgh PA 15227

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Daniel Oberdick, Esquire

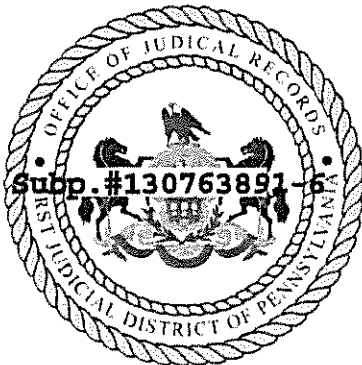
Date: March 27, 2018

Address: 130 North 18th Street
One Logan Square
Philadelphia, PA 19103

Telephone: 215 569-5500

Supreme Court ID#:

Attorney for:



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712

Rider to Subpoena

Explanation of Required Documents and Things

TO: CUSTODIAN OF RECORDS FOR:

A.P.
3479 Emerald Street
Philadelphia PA 19134

Subject: REDACTED

Requested Items:

Please Remit: Any records you have including papers; e-mails; texts and other social media messages, from 2012 through the present that relate to: (1) Subject's place of residence; (2) People or organizations that were responsible for caring for subject; (3) Subject's education; (4) Subject's social activities; (5) Subject's arrests and/or contact with law enforcement and the courts; (6) Subject's cellular phone provider(s); and (7) Subject's experience of being the victim of human trafficking.

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.

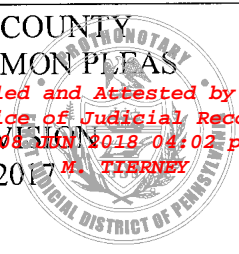
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PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

*Filed and Attested by the
Office of Judicial Records
08 JUN 2018 04:02 pm
M. TIERNEY*



ORDER

AND NOW, this day of , 2018, upon consideration of
Minor-Plaintiff's Motion to Compel Compliance with Subpoena Directed to The Villa and any
response thereto, it is hereby;

ORDERED and **DECREED** that Minor-Plaintiff's Motion is **GRANTED** and The Villa
shall produce all documents in its possession that are responsive to Minor-Plaintiff's Subpoena
within ten (10) days of the date of this Order. Failure to comply with this Order may result in
sanctions upon application to the Court.

BY THE COURT:

J.

DISCOVERY DEADLINE: OCTOBER 1, 2018

Case ID: 170300712

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

**MINOR-PLAINTIFF M.B.'S MOTION TO COMPEL COMPLIANCE WITH
 SUBPOENA DIRECTED TO THE VILLA**

1. Minor-Plaintiff M.B., by and through counsel, Kline & Specter, P.C., requests this Honorable Court compel The Villa to comply with a Subpoena served upon it and in support thereof states the following:

2. This case involves the human sex trafficking of Minor-Plaintiff M.B. at the Roosevelt Inn at 7630 Roosevelt Boulevard, Philadelphia, PA 19152.

3. On October 5, 2017, Minor-Plaintiff's counsel served defense counsel with a Notice of Intent to Serve a Subpoena on The Villa with a copy of the proposed Subpoena attached. See October 5, 2017, letter to defense counsel attached as Exhibit "A", and Notice of Intent with Subpoena and Addendum, attached as Exhibit "B".

4. The Subpoena requested "a complete copy of the entire file pertaining to [M.B.]; and any and all documents you may have relating to [M.B.] including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System,

incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding [M.B.]” See Ex. “B”.

5. Defense counsel did not object to the Notice of Intent to Serve a Subpoena on The Villa.

6. On November 8, 2017, Minor-Plaintiff filed a Certificate of Prerequisite to Service of a Subpoena Pursuant to Rule 4009.21. See Certificate Prerequisite, attached as Exhibit “C”.

7. The Subpoena with Addendum were served on The Villa.

8. On February 9, 2018, Minor-Plaintiff sent a follow-up letter to The Villa. See February 9, 2018, letter to The Villa as Exhibit “D”.

9. On February 20, 2018, Minor-Plaintiff only received ten pages of records from The Villa, despite the records indicating that Minor-Plaintiff was part of the program for over a year.

10. On June 4, Minor-Plaintiff sent follow up correspondence to The Villa seeking a complete set of Minor-Plaintiff’s records, which were requested by the subpoena. See June 4, 2018, letter to the Villa attached as Exhibit “E”.

11. To date, The Villa has failed to comply with the Subpoena.


12. The Villa has not filed objections to the Subpoena and any objections filed in the future would be untimely.

13. The requested information is relevant to Minor-Plaintiff’s case and Minor-Plaintiff will be unfairly prejudiced if the requested documents are not produced.

WHEREFORE, Minor-Plaintiff respectfully requests this Court enter the attached proposed Order compelling The Villa to comply with Minor-Plaintiff's Subpoena.

Respectfully submitted,

KLINE & SPECTER, P.C.



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff

KLINE & SPECTER, P.C.

Attorneys for Minor-Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED
	:	

To: The Villa
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

Please take notice that the following Motion:

- ☒ Minor-Plaintiff's Motion to Compel Compliance with Subpoena directed to The Villa
- ☐ Defendant's Motion _____

will be presented to the Court on the date and time provided electronically by the Court in the Court Room listed on the electronic confirmation, City Hall, Philadelphia, PA. See electronic confirmation to be provided.

By: Kyle Nocho
KYLE B. NOCHO, ESQUIRE
Attorney I.D. No. 319270
Telephone Number: 215.772-1000
Address: Kline & Specter, P.C.
1525 Locust Street, Philadelphia, PA 19102

Date: June 8, 2018

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to The Villa was filed with the Court on June 8, 2018 and served by electronic filing upon the following counsel of record:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103
President of Defendant Alpha-Centurion Security, Inc.

I do hereby certify that service of a true and correct copy of the above Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to The Villa was served by registered, return receipt mail on the following upon acceptance of electronic filing:

The Villa
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

By: 
KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Dated: June 8, 2018

Attorney Certification of Good Faith

Pursuant to Phila.Civ.R. * 208.2(e)

The undersigned counsel for Movant hereby certifies and attests that:

☒ a. He or she has had the contacts described below with opposing counsel about the subject matter of the foregoing discovery motion in an effort to resolve the specific discovery dispute(s) at issue and, further, that despite all counsel's good faith attempts to resolve the dispute(s), counsel have been unable to do so.

Description:

Minor-Plaintiff's counsel sent follow up correspondence to The Villa, to no avail.

☐ b. He or she has made good faith but unsuccessful efforts described below to contact opposing counsel or unrepresented party in an effort to resolve the discovery dispute(s).

CERTIFIED TO THE COURT BY:



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

VERIFICATION

I, KYLE B. NOCHO, ESQUIRE, hereby state that I am the attorney for Minor-Plaintiff M.B. in this matter and hereby verify that the statements made in the foregoing Minor-Plaintiff's Motion to Compel to Compel Compliance with Subpoena directed to The Villa are true and correct to the best of my knowledge, information and belief.

The undersigned understands that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

EXHIBIT A

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365

FAX: 215-772-1005

October 5, 2017

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

Re: M.B. v. Roosevelt Inn LLC, et al.
Philadelphia CCP, March Term, 2017, No. 00712

Dear Counsel:

Enclosed please find Plaintiff's Notice of Intent to serve a Subpoena addressed to the following:

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

Please advise if you agree to waive the 20 day waiting period.

Thank you.

Very truly yours,



Kyle B. Nocho

KBN/dd
Encl.

EXHIBIT B

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Minor-Plaintiff

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
and
ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
and
UFVS MANAGEMENT COMPANY, LLC
and
YAGNA PATEL

Defendants

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED


**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

KLINE & SPECTER, P.C.

BY:


KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Date: 10/5/2017

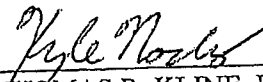
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

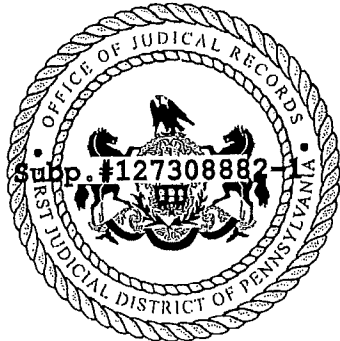
Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:
M.B.

DOB: [REDACTED]

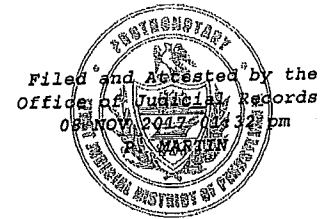
Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.

EXHIBIT C

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000



M.B., minor by her Guardian, WILLIAM A. CALANDRA, ESQUIRE Plaintiff,	:	PHILADELPHIA COUNTY COURT OF COMMON PLEAS
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFE	:	JURY TRIAL DEMANDED
and	:	
ROOSEVELT MOTOR INN, INC.	:	
d/b/a ROOSEVELT MOTOR INN	:	
and	:	
UFVS MANAGEMENT COMPANY, LLC	:	
and	:	
YAGNA PATEL	:	
Defendants	:	

**CERTIFICATE PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.21**

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22, the undersigned certifies the following:

- (1) a notice of intent to serve the subpoenas with a copy of the subpoenas attached thereto was mailed or delivered to each party at least twenty days prior to the date on which the subpoenas are sought to be served,
- (2) a copy of the notices of intent, including the proposed subpoenas, is attached to this certificate,
- (3) no objection to the subpoenas has been received, and
- (4) the subpoenas which will be served are identical to the subpoenas which are attached to the notice of intent to serve the subpoenas.

KLINE & SPECTER, P.C.

BY:

Kyle Nocho

KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

Date: 11/8/17

Case ID: 170300712


CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiffs, do hereby certify that a true and correct copy of a Certificate Prerequisite to Service of a Subpoena was served upon the following counsel of record via electronic filing on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 11/8/17



KYLE B. NOCHO, ESQUIRE
Attorney for Plaintiffs

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
NADEEM A. BEZAR, ESQUIRE/63577
EMILY B. MARKS, ESQUIRE/204405
KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
Philadelphia, Pennsylvania 19102
(215) 772-1000

Attorneys for Minor-Plaintiff

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
and
ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
and
UFVS MANAGEMENT COMPANY, LLC
and
YAGNA PATEL

Defendants

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

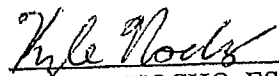
**NOTICE OF INTENT TO SERVE A SUBPOENA TO PRODUCE DOCUMENTS AND
THINGS FOR DISCOVERY PURSUANT TO RULE 4009.21**

Minor-Plaintiff intends to serve Subpoenas identical to the ones attached to this notice. You have twenty (20) days from the date listed below in which to file of record and serve upon the undersigned an objection to the subpoena. If no objection is made, the subpoena may be served.

- The Villa
- VisionQuest
- Joseph J. Peters Institute
- Sobriety Through Outpatient Philadelphia
- New Directions Treatment Services
- Visiting Nurse Association Community Services
- Tabor Children's Services
- First Home Care
- Asociacion Puertorriquenos en Marcha, Inc. ("APM")
- Philadelphia Department of Human Services

KLINE & SPECTER, P.C.

BY:


KYLE B. NOCHO, ESQUIRE
Attorney for Minor-Plaintiff

Date: 10/5/2017

Case ID: 170300712

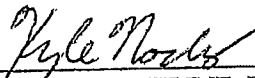
CERTIFICATE OF SERVICE

I, Kyle B. Nocho, Esquire attorney for Plaintiff, do hereby certify that a true and correct copy of Notice of Intent to Serve a Subpoena was served upon the following counsel of record via U.S. Mail on the below date:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Date: 10/5/2017



THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE
Attorneys for Minor-Plaintiff



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Kyle B. Nocho

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:
M.B.

DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISIONQUEST

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street PHILADELPHIA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Kyle B. Nocho

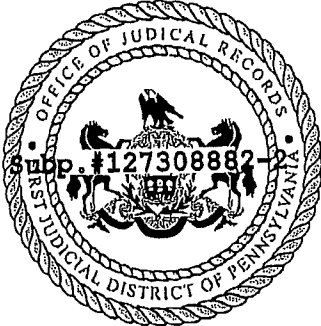
Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL

Court of Common Pleas

March Term, 17

No. 00712

TO: VISIONQUEST

(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

**VISIONQUEST
5201 Old York Road
Suite 106
Philadelphia, PA 19141
Attn: Custodian of Records**

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. , and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding

M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: JOSEPH J. PETERS INSTITUTE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

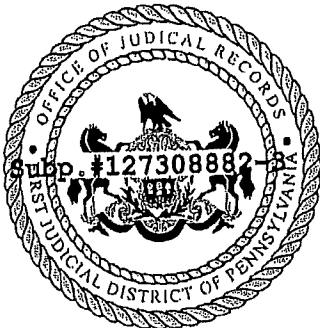
Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL

Court of Common Pleas

March Term, 17

No. 00712

TO: JOSEPH J. PETERS INSTITUTE

(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

JOSEPH J. PETERS INSTITUTE
100 South Broad Street, 17th Floor.
Philadelphia, PA 19110
Attn: Custodian of Records

M.B. DOB: [REDACTED]

You are to provide any and all records pertaining to: M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

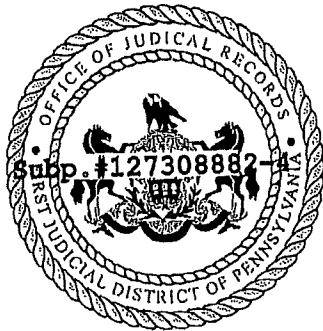
Name: Nocho, Kyle B

Address: Kline & Specter, P.C.
1525 Locust Street
Philadelphia, PA 19102

Telephone: 215 772-1000

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: SOBRIETY THROUGH OUTPATIENT PHILADELPHIA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Sobriety Through Outpatient Philadelphia ("STOP")
2534-326 N. Broad Street, STE 200
Philadelphia, PA 19132
Attn: Custodian of Records

M.B.

DOB: [REDACTED]

You are to provide any and all records pertaining to [REDACTED] M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B. .



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: NEW DIRECTIONS TREATMENT SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

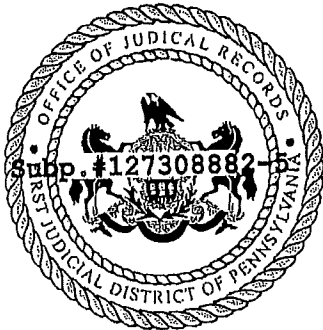
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: aCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL

Court of Common Pleas

March Term, 17

No. 00712

TO: NEW DIRECTIONS TREATMENT SERVICES
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

New Directions Treatment Services
2442 Broadhead Road
Bethlehem, PA 18020
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to: M.B., including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

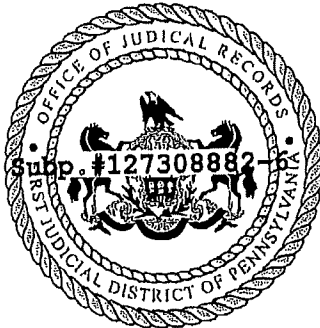
Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder

Deputy Court Administrator

Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL

Court of Common Pleas

March Term, 17

No. 00712

TO: VISITING NURSE ASSOCIATION COMMUNITY SVCS
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TO CUSTODIAN OF RECORDS FOR:

Visiting Nurse Association Community Services, Inc.
1421 Highland Avenue
Abington, PA 19001
Attn: Custodian of Records

M.B. **DOB:** [REDACTED]

You are to provide any and all records pertaining to M.B. , including any and all medical records, therapy records, counseling records, statements, recordings, videos, DVDs, forensic interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: TABOR CHILDREN'S SERVICES
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Date: October 05, 2017

Name: Nocho, Kyle B

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL

Court of Common Pleas

March Term, 17

No. 00712

TO: TABOR CHILDREN'S SERVICES

(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

TABOR CHILDREN'S SERVICES
57 E. Armat Street
Philadelphia, PA 19144
Attn: Custodian of Records

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B. and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: FIRST HOME CARE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: Kline & Specter, P.C. 1525 Locust Street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B

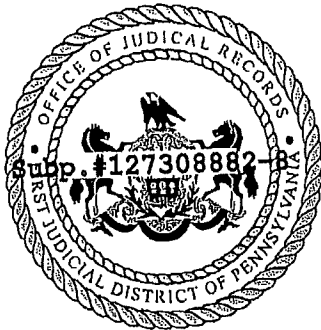
Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:

Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B, ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: FIRST HOME CARE
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

**FIRST CARE HOME
4641 Roosevelt Boulevard
Philadelphia, PA 19124
Attn: Custodian of Records**

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street Philadelphia PA 19102
(Address)

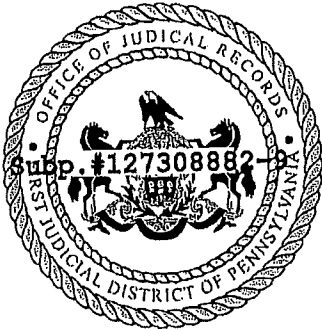
You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Date: October 05, 2017



Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF

You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: ASOCIACION PUERTORRIQUENOS EN MARCHA INC.
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

APM
1900 North 9th Street
Philadelphia, PA 19122
Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M.B., and any and all documents you may have relating to M.B. including, but not limited to, all CUA documents, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M.B.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: PHILADELPHIA DEPT OF HUMAN SERVICES
(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust Street PHILADELPHIA PA 19102
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

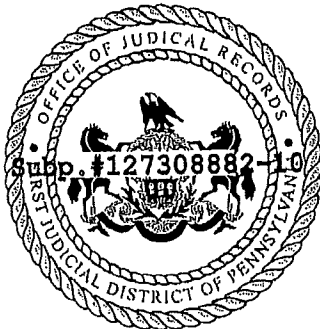
Date: October 05, 2017

Name: Nocho, Kyle B
Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records

Case ID: 170300712



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL

Court of Common Pleas

March Term, 17

No. 00712

TO: PHILADELPHIA DEPT OF HUMAN SERVICES

(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

PHILADELPHIA DEPARTMENT OF HUMAN SERVICES
1515 Arch Street, 16th Floor
Philadelphia, PA 19102
Attn: Custodian of Record

RECORDS PERTAIN TO:

M.B. **DOB:** [REDACTED]

Within twenty (20) days after the service of this subpoena, you are ordered by the court to produce the following documents or things: any and all records pertaining to M.B. ; DOB: 9/3/1999, including but not limited to any and all CUA records, correspondence to and/or from other agencies or individuals, child placement, child permanency plans, case notes, court orders, investigation reports, medical records including psychiatric treatment records, evaluation reports and counseling records, and any other document to consist of your entire file regarding M.B.

EXHIBIT D

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

February 9, 2018

Via First Class Mail

The Villa
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

**Re: M.B., a minor v. Roosevelt Inn, LLC et al.
Philadelphia CCP, March Term, 2017, No. 00712**

Dear Custodian of Records:

On November 8, 2017, we served The Villa with a Subpoena to Produce Documents in connection with the above-captioned matter (see attached). Pursuant to the Pennsylvania Rules of Civil Procedure, the requested records should have been produced no later than November 28, 2017. To date, there has been no response to Plaintiff's subpoena.

Please forward the subpoenaed records to my attention immediately, to avoid having a motion filed against you. Please also forward the completed Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23 and return to me along with the requested records

Thank you.

Very truly yours,



KYLE B. NOCHO

KBN/dd
Encl.

EXHIBIT E

KLINE & SPECTER PC
ATTORNEYS AT LAW
1525 LOCUST STREET
PHILADELPHIA, PENNSYLVANIA 19102
WWW.KLINESPECTER.COM

KYLE B. NOCHO

KYLE.NOCHO@KLINESPECTER.COM

215-772-1365
FAX: 215-772-1005

June 4, 2018

Via Certified Return Receipt Mail

The Villa
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

**Re: M.B., a minor v. Roosevelt Inn, LLC et al.
Philadelphia CCP, March Term, 2017, No. 00712**

Dear Custodian of Records:

On November 8, 2017, we served The Villa with a Subpoena to Produce Documents in connection with the above-captioned matter (see attached). On February 20, 2018, we received about ten pages of the records requested by the subpoena.

The subpoena requested records for our client M [REDACTED] B [REDACTED] (D.O.B: [REDACTED]), including a:

copy of the entire file pertaining to M [REDACTED] B [REDACTED], and any and all documents you may have relating to M [REDACTED] B [REDACTED] including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M [REDACTED] B [REDACTED].

Please forward a complete set of the requested records to my attention immediately, to avoid having a motion filed against you. Please also forward the completed Certificate of Compliance with Subpoena to Produce Documents or Things Pursuant to Rule 4009.23 and return to me along with the requested records

KLINE & SPECTER _{PC}
ATTORNEYS AT LAW

Thank you.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Kyle Nocho".

KYLE B. NOCHO

KBN/cl
Encl.



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

Court of Common Pleas

B. ETAL VS ROOSEVELT INN LLC ETAL

March Term, 17

No. 00712

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

TO: THE VILLA

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

See Addendum "A", attached.

at: KLINE & SPECTER, P.C. 1525 Locust street 1525 Locust street Philadelphia PA 19102

(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

Name: Kyle B. Nocho

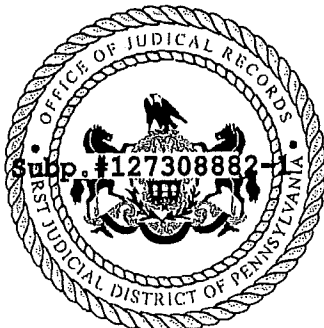
Date: October 05, 2017

Address: Kline And Specter, P.C.
1525 Locust Street, 7th Floor
Philadelphia, PA 19102

Telephone: 215 772-1365

Supreme Court ID#: 319270

Attorney for: PLAINTIFF



You may contact the Office of Judicial Records to verify that this subpoena was issued by the Philadelphia County Court of Common Pleas.
Phone: (215) 686-4251 or
Email: eCommCertSupport@courts.phila.gov

BY THE COURT:
Eric Feder
Deputy Court Administrator
Director, Office of Judicial Records



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF PHILADELPHIA

B. ETAL VS ROOSEVELT INN LLC ETAL : Court of Common Pleas
:
: March Term, 17
:
: No. 00712

TO: THE VILLA
(Person served with subpoena)

You are required to complete the following Certificate of Compliance with producing documents or things pursuant to the Subpoena. Send the documents or things, along with the Certificate of Compliance (with your original signature), to the person at whose request the subpoena was issued.

*Do not send the documents or things,
or the Certificate of Compliance,
to the Office of Judicial Records.*

**Certificate of Compliance with Subpoena to Produce
Documents or Things Pursuant to Rule 4009.23**

I, _____
(Person served with subpoena)

certify to the best of my knowledge, information and belief that all documents or things required to be produced pursuant to the subpoena issued on _____ have been produced.
(Date of Subpoena)

Date: _____

(Signature of Person Served with Subpoena)

ADDENDUM "A"

THE VILLA
1100 Adams Avenue
Philadelphia, PA 19124
Attn: Custodian of Records

RECORDS PERTAIN TO:

M [REDACTED] B [REDACTED] DOB: [REDACTED]

Within twenty (20) days after the service of this subpoena, you are to provide a complete copy of the entire file pertaining to M [REDACTED] B [REDACTED], and any and all documents you may have relating to M [REDACTED] B [REDACTED] including, but not limited to, all CUA documents, foster care records, all documents on the Electronic Case Management System, incident reports, medical records, therapy records, correspondence, memoranda, photographs, statements, interviews and/or investigative reports, and any other document to consist of your entire file regarding M [REDACTED] B [REDACTED].

39

M.B., minor by her Guardian,
William A. Calandra, Esquire,

Plaintiff,

v.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.,

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL TRIAL DIVISION

MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

ORDER

AND NOW, this 12TH day of JUNE, 2018, upon consideration of

Defendants Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Café, Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn, UFVS Management Company, LLC and Yagna Patel's Motion to Enforce Subpoena, it is hereby ORDERED that said Motion is GRANTED.

The Joseph J. Peters Institute is hereby commanded to produce the documents requested by subpoena, at the offices of Defendants' counsel, Blank Rome LLP, One Logan Square, Philadelphia, PA 19103, within ⁽²⁰⁾~~ten (10)~~ days of the date of this Order, or appropriate sanctions shall ~~be imposed upon the~~ Joseph J. Peters Institute upon application to the Court.

JUN 12 2018

UNCONTESTED

BY THE COURT:

[Signature]
J.

Discovery deadline: October 1, 2018

B. Etal Vs Roosevelt Inn Llc Etal-ORDER



17030071200067

DOCKETED

JUN 13 2018

MICHAEL TIERNEY
JUDICIAL RECORDS

M.B., minor by her Guardian, WILLIAM A. CALANDRA, ESQUIRE	:	PHILADELPHIA COUNTY COURT OF COMMON PLEAS
V.	:	CIVIL TRIAL DIVISION
ROOSEVELT INN LLC	:	MARCH TERM, 2017
d/b/a ROOSEVELT INN and	:	NO.: 00712
ROOSEVELT INN CAFÉ, et al.	:	JURY TRIAL DEMANDED

ORDER

AND NOW, this ¹¹19 day of JUNE, 2018, upon consideration of Minor-Plaintiff's Motion to Compel Compliance with Subpoena Directed to New Directions Treatment Services and any response thereto, it is hereby;

ORDERED and **DECREED** that Minor-Plaintiff's Motion is **GRANTED** and New Directions Treatment Services shall produce all documents in its possession that are responsive to Minor-Plaintiff's Subpoena within ⁽²⁰⁾ten (10) days of the date of this Order. Failure to comply with this Order may result in sanctions upon application to the Court.

BY THE COURT:

B. Etal Vs Roosevelt Inn Llc Etal-ORDER



17030071200070

Ann M. Bitchart

J.

DOCKETED

JUN 19 2018

D. STEWART
JUDICIAL RECORDS**MOTION GRANTED**

JUN 19 2018

UNCONTESTED**DISCOVERY DEADLINE: OCTOBER 1, 2018**

Case ID: 170300712

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

Filed and Attested by the
CIVIL TRIAL DIVISION Judicial Records
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

ORDER

AND NOW, this TH19 day of JUNE, 2018, upon consideration of

Minor-Plaintiff's Motion to Compel Compliance with Subpoena Directed to Sobriety Through Outpatient Philadelphia and any response thereto, it is hereby;

ORDERED and **DECREED** that Minor-Plaintiff's Motion is **GRANTED** and Sobriety Through Outpatient Philadelphia shall produce all documents in its possession that are responsive to Minor-Plaintiff's Subpoena within ⁽²⁰⁾~~ten (10)~~ days of the date of this Order. Failure to comply with this Order may result in sanctions upon application to the Court.

BY THE COURT:

B. Etal Vs Roosevelt Inn Llc Etal-ORDER



DOCKETED
JUN 19 2018
D. STEWART
JUDICIAL RECORDS

MOTION SUBMITTED

JUN 19 2018

UNCONTESTED

DISCOVERY DEADLINE: OCTOBER 1, 2018

Case ID: 170300712

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFÉ, et al.

PHILADELPHIA COUNTY
COURT OF COMMON PLEAS

Filed and Attested by the
CIVIL TRIAL DIVISION Judicial Records
26 JUN 2018 12:52 pm
M. TIERNEY
NO.: 00712

JURY TRIAL DEMANDED

ORDER

AND NOW, this TH19 day of JUNE, 2018, upon consideration of
Minor-Plaintiff's Motion to Compel Compliance with Subpoena Directed to VisionQuest and
any response thereto, it is hereby;

ORDERED and **DECREED** that Minor-Plaintiff's Motion is **GRANTED** and
VisionQuest shall produce all documents in its possession that are responsive to Minor-
Plaintiff's Subpoena within ⁽²⁰⁾~~(10)~~ days of the date of this Order. Failure to comply with this
Order may result in sanctions upon application to the Court.

BY THE COURT:

B. Etal Vs Roosevelt Inn Llc Etal-ORDER



17030071200069

Ann M. Tulech
J.

DOCKETED

JUN 19 2018

D. STEWART
JUDICIAL RECORDS

MOTION SUBMITTED

JUN 19 2018

*** UNCONTESTED**

DISCOVERY DEADLINE: OCTOBER 1, 2018

Case ID: 170300712

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the United States District Court for the Eastern District of Pennsylvania: Case Records of the Appellate and Trial Courts* requires filing confidential information and documents differently than non-confidential information and documents.



Submitted by: MARSHALL, DENNEHEY, WARNER,
COLEMAN, GOGGIN

Signature: ROBERT STANKO,
ESQUIRE /S

Attorney: ROBERT STANKO, ESQUIRE

Attorney No. (if applicable):

**CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22**

In the Matter of:

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

Philadelphia County

March Term, 2017

No. 00712

- VS -

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

CCLR on behalf of ROBERT STANKO, ESQUIRE

Defendant certifies that

- (1) A notice of intent to serve the subpoena(s) with a copy of the subpoena(s) attached thereto was/were mailed or delivered to each party at least twenty days prior to the date on which the subpoena(s) is/are sought to be served.
- (2) A copy of the notice of intent, including the proposed subpoena(s), is attached to the certificate.
- (3) No objection to the subpoena(s) has been received.
- (4) The subpoena(s) which will be served is/are identical to the subpoena(s) which is/are attached to the notice of intent to serve the subpoena(s).

DATE: 7/16/2018

ROBERT STANKO, ESQUIRE

Counsel for Defendant



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 Fax: See Signature Below

Online Services www.cclrinc.com

June 25, 2018

M.B., A MINOR BY HER GUARDIAN,
WILLIAM A. CALANDRA, ESQUIRE

VS.

IN THE COURT OF COMMON PLEAS
PHILADELPHIA County

ROOSEVELT INN, LLC, ALPHA-
CENTURION SECURITY, INC., ET AL.

March Term, 2017

No. 00712

**Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant To Rule 4009.21**

NADEEM A. BEZAR, ESQUIRE
KLINE & SPECTER, P.C.
1525 LOCUST STREET
19TH FLOOR
PHILADELPHIA, PA 19102

CCLR, on behalf of ROBERT STANKO, ESQUIRE, Counsel for the Defendant in the above case, intends to serve a subpoena(s) for production and copying of records.

Please take notice that you have until 7/16/2018 in which to file an objection to any or all of the subpoena(s). If the waiting period is waived or if no objection is made then subpoena(s) will be served.

A copy of this letter will be sent to each provider along with the subpoena as satisfactory assurance that you have been placed on notice and afforded an opportunity to object to the subpoena(s).

Please find enclosed copy (copies) of subpoena(s) to be served on the custodian of records and also a Request for Copies form to be filled out and returned if copies are requested.

Should you have any questions please do not hesitate to contact me.

Sincerely,

Jackie Fennal

Jackie Fennal
CCLR Representative
Phone: (215)790-5712
Fax No.: (215)825-7290
Email: jfennal@cclrinc.com



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 Fax: See Signature Below

Online Services www.cclrinc.com

June 25, 2018

M.B., A MINOR BY HER GUARDIAN,
WILLIAM A. CALANDRA, ESQUIRE

VS.

IN THE COURT OF COMMON PLEAS
PHILADELPHIA County

ROOSEVELT INN, LLC, ALPHA-
CENTURION SECURITY, INC., ET AL.

March Term, 2017

No. 00712

**Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant To Rule 4009.21**

DANIEL OBERDICK, ESQUIRE
BLANK ROME LLP
ONE LOGAN SQUARE - 3RD FLOOR
18TH AND CHERRY STREETS
PHILADELPHIA, PA 19103

CCLR, on behalf of ROBERT STANKO, ESQUIRE, Counsel for the Defendant in the above case, intends to serve a subpoena(s) for production and copying of records.

Please take notice that you have until 7/16/2018 in which to file an objection to any or all of the subpoena(s). If the waiting period is waived or if no objection is made then subpoena(s) will be served.

A copy of this letter will be sent to each provider along with the subpoena as satisfactory assurance that you have been placed on notice and afforded an opportunity to object to the subpoena(s).

Please find enclosed copy (copies) of subpoena(s) to be served on the custodian of records and also a Request for Copies form to be filled out and returned if copies are requested.

Should you have any questions please do not hesitate to contact me.

Sincerely,

Jackie Fennal

Jackie Fennal
CCLR Representative
Phone: (215)790-5712
Fax No.: (215)825-7290
Email: jfennal@cclrinc.com

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : ASOCIACION PUERTORRIQUENOS EN MARCHE, INC.
A.K.A APM

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563917

PRO



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563917

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: ASOCIACION PUERTORRIQUENOS EN MARCHE, INC. - A.K.A APM

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : CHESTNUT HILL WOMEN'S HEALTH ASSOCIATES
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563936

PRO _____

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS *Plaintiff*

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : DEPARTMENT OF HUMAN SERVICES
ATTN: JONATHAN HOULON, ESQUIRE

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563921

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563921

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: DEPARTMENT OF HUMAN SERVICES - ATTN: JONATHAN HOULON, ESQUIRE

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, CASE NUMBER 227582-B INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS *Plaintiff*

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : FIRST HOME CARE
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563915

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563915

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: FIRST HOME CARE - MEDICAL RECORDS DEPARTMENT

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : KEYSTONE FIRST
RECORDS DEPT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ALL RECORDS CONCERNING M.B., A MINOR, KEYSTONE FIRST ID# YXM 50804759, INCLUDING CLAIM SUBMISSIONS AND DETERMINATIONS, INVOICE RECORDS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563924

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS *Plaintiff*

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : NEW DIRECTIONS YOUTH AND FAMILY SERVICES
RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563905

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563905

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: NEW DIRECTIONS YOUTH AND FAMILY SERVICES - RECORDS DEPARTMENT

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

No. 00712

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : SOBRIETY THROUGH OUTPATIENT, INC.
INTEGRATED BEHAVIORAL HEALTH SERVICES

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563889

PRO



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563889

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: SOBRIETY THROUGH OUTPATIENT, INC. - INTEGRATED BEHAVIORAL HEALTH
SERVICES

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT
LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER
ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING
AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS,
PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE
EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : TABOR CHILDREN'S SERVICES
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563913

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563913

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: TABOR CHILDREN'S SERVICES - MEDICAL RECORDS DEPARTMENT

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : TEMPLE URGENT CARE
MEDICAL RECORDS DEPT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563935

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

No. 00712

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : THE VILLA
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563893

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563893

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: THE VILLA - MEDICAL RECORDS DEPARTMENT

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS *Plaintiff*

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : VISIONQUEST
RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563882

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563882

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: VISIONQUEST - RECORDS DEPARTMENT

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS *Plaintiff*

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : VISITING NURSE ASSOCIATION COMMUNITY SERVICES
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

*** SEE ATTACHED ADDENDUM ***

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09322JF/R
ID: 563903

PRO _____



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 (phone) (215)825-7290 (Fax)

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

VS

Plaintiff

CCLR File No. 18-09322JF/R

ID# / Tracking # 563903

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

Defendant

No. 00712

ADDENDUM TO SUBPOENA

To: VISITING NURSE ASSOCIATION COMMUNITY SERVICES - MEDICAL RECORDS
DEPARTMENT

Re: M.B., A MINOR

ANY AND ALL RECORDS AND THINGS CONCERNING M.B., A MINOR, INCLUDING BUT NOT LIMITED TO, REFERRALS, PLACEMENT RECORDS, ACADEMIC RECORDS, TEACHER ASSESSMENTS, ELECTRONIC CASE MANAGEMENT DOCUMENTS, PSYCHIATRIC, COUNSELING AND MEDICAL RECORDS, CASE EVALUATIONS, COURT DOCUMENTS, CUA DOCUMENTS, PHOTOGRAPHS AND CORRESPONDENCE. MUST INCLUDE CERTIFICATE OF COMPLIANCE EXECUTED BY THE RECORD CUSTODIAN.

CERTIFICATE OF COMPLIANCE

I certify that this filing complies with the provisions of the *Public Access Policy of the United States District Court for the Eastern District of Pennsylvania: Case Records of the Appellate and Trial Courts* requires filing confidential information and documents differently than non-confidential information and documents.



Submitted by: MARSHALL, DENNEHEY, WARNER,
COLEMAN, GOGGIN

Signature: ROBERT STANKO,
ESQUIRE /S

Attorney: ROBERT STANKO, ESQUIRE

Attorney No. (if applicable):

**CERTIFICATE
PREREQUISITE TO SERVICE OF A SUBPOENA
PURSUANT TO RULE 4009.22**

In the Matter of:

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

Philadelphia County

March Term, 2017

No. 00712

- VS -

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

As a prerequisite to service of a subpoena for documents and things pursuant to Rule 4009.22

CCLR on behalf of ROBERT STANKO, ESQUIRE

Defendant certifies that

- (1) A notice of intent to serve the subpoena(s) with a copy of the subpoena(s) attached thereto was/were mailed or delivered to each party at least twenty days prior to the date on which the subpoena(s) is/are sought to be served.
- (2) A copy of the notice of intent, including the proposed subpoena(s), is attached to the certificate.
- (3) No objection to the subpoena(s) has been received.
- (4) The subpoena(s) which will be served is/are identical to the subpoena(s) which is/are attached to the notice of intent to serve the subpoena(s).

DATE: 7/16/2018

ROBERT STANKO, ESQUIRE

Counsel for Defendant



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 Fax: See Signature Below

Online Services www.cclrinc.com

June 26, 2018

M.B., A MINOR BY HER GUARDIAN,
WILLIAM A. CALANDRA, ESQUIRE

VS.

IN THE COURT OF COMMON PLEAS
PHILADELPHIA County

ROOSEVELT INN, LLC, ALPHA-
CENTURION SECURITY, INC., ET AL.

March Term, 2017

No. 00712

**Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant To Rule 4009.21**

NADEEM A. BEZAR, ESQUIRE
KLINE & SPECTER, P.C.
1525 LOCUST STREET
19TH FLOOR
PHILADELPHIA, PA 19102

CCLR, on behalf of ROBERT STANKO, ESQUIRE, Counsel for the Defendant in the above case, intends to serve a subpoena(s) for production and copying of records.

Please take notice that you have until 7/16/2018 in which to file an objection to any or all of the subpoena(s). If the waiting period is waived or if no objection is made then subpoena(s) will be served.

A copy of this letter will be sent to each provider along with the subpoena as satisfactory assurance that you have been placed on notice and afforded an opportunity to object to the subpoena(s).

Please find enclosed copy (copies) of subpoena(s) to be served on the custodian of records and also a Request for Copies form to be filled out and returned if copies are requested.

Should you have any questions please do not hesitate to contact me.

Sincerely,

Jackie Fennal

Jackie Fennal
CCLR Representative
Phone: (215)790-5712
Fax No.: (215)825-7290
Email: jfennal@cclrinc.com



Center City Legal Reproductions, Inc.

1315 Walnut Street, Suite 601, Philadelphia, PA 19107

(215)732-1177 Fax: See Signature Below

Online Services www.cclrinc.com

June 26, 2018

M.B., A MINOR BY HER GUARDIAN,
WILLIAM A. CALANDRA, ESQUIRE

VS.

IN THE COURT OF COMMON PLEAS
PHILADELPHIA County

ROOSEVELT INN, LLC, ALPHA-
CENTURION SECURITY, INC., ET AL.

March Term, 2017

No. 00712

**Notice of Intent to Serve a Subpoena to Produce Documents and Things for
Discovery Pursuant To Rule 4009.21**

DANIEL OBERDICK, ESQUIRE
BLANK ROME LLP
ONE LOGAN SQUARE - 3RD FLOOR
18TH AND CHERRY STREETS
PHILADELPHIA, PA 19103

CCLR, on behalf of ROBERT STANKO, ESQUIRE, Counsel for the Defendant in the above case, intends to serve a subpoena(s) for production and copying of records.

Please take notice that you have until 7/16/2018 in which to file an objection to any or all of the subpoena(s). If the waiting period is waived or if no objection is made then subpoena(s) will be served.

A copy of this letter will be sent to each provider along with the subpoena as satisfactory assurance that you have been placed on notice and afforded an opportunity to object to the subpoena(s).

Please find enclosed copy (copies) of subpoena(s) to be served on the custodian of records and also a Request for Copies form to be filled out and returned if copies are requested.

Should you have any questions please do not hesitate to contact me.

Sincerely,

Jackie Fennal

Jackie Fennal
CCLR Representative
Phone: (215)790-5712
Fax No.: (215)825-7290
Email: jfennal@cclrinc.com

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : ALEXANDRA SCHEIBER, M.D.
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564134

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : ARIA JEFFERSON HEALTH
PHYSICIAN'S BILLING

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY AND ALL BILLING RECORDS , INVOICES, PAYMENTS, RECEIPTS, PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564431

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : ARIA JEFFERSON HEALTH SYSTEM
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, RADIOLOGICAL REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564122

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : DR. BRUCE HOPPER
MEDICAL RECORDS DEPT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564138

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : ELAINA TULLY, M.D.
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564130

PRO _____

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : FRANKLIN YATES, M.D.
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564129

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : JAYNE BROWN, MD
MEDICAL RECORDS DEPT.

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564124

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : KARAM MOUNZER, MD
MEDICAL RECORDS DEPT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564132

PRO

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : MARIA LISA LAMBERT, M.D.
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564127

PRO _____

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS *Plaintiff*

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : ROBERTA LAGUERRE, M.D.
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564133

PRO _____

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : SUSAN PACKER, M.D.
MEDICAL RECORDS DEPARTMENT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

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This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564126

PRO _____

COUNTY OF PHILADELPHIA

M.B., A MINOR BY HER GUARDIAN, WILLIAM A.
CALANDRA, ESQUIRE

Court of Common Pleas

VS

Plaintiff

March Term, 2017

ROOSEVELT INN, LLC, ALPHA-CENTURION
SECURITY, INC., ET AL.

No. 00712

Defendant

**Subpoena to Produce Documents or Things
for Discovery Pursuant to Rule 4009.22**

To : TEMPLE READY CARE
MEDICAL RECORDS DEPT

(Name of Person or Entity)

Within twenty (20) days after the service of this subpoena, you are ordered by the Court to produce the following documents or things:

ANY & ALL MEDICAL RECORDS , ELECTRONICALLY STORED RECORDS, REPORTS, OFFICE & DOCTORS NOTES, CHARTS, EVALUATIONS, LABS & TEST RESULTS, ETC., PERTAINING TO M.B., A MINOR. **CERTIFICATION PAGE MUST BE SIGNED AND DATED.

At: Center City Legal Reproductions, Inc.

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed below. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

This subpoena was issued at the request of the following person:

DATE: July 16, 2018

Name: ROBERT STANKO, ESQUIRE
Address: Center City Legal Reproductions, Inc.
1315 Walnut Street
Suite 601
Philadelphia, PA 19107
Telephone: (215)732-1177
Supreme Court ID#:
Attorney for: DEFENDANT

SEAL

BY THE COURT:
Eric Feder
Director, Office of Judicial Records

18-09371JF/R
ID: 564128

PRO

PHILADELPHIA COURT OF COMMON PLEAS PETITION/MOTION COVER SHEET

FOR COURT USE ONLY

ASSIGNED TO JUDGE:

ANSWER/RESPONSE DATE:

08/06/2018

*Do not send Judge courtesy copy of Petition/Motion/Answer/Response.
Status may be obtained online at <http://courts.phila.gov>*

CONTROL NUMBER:

18073174

**(RESPONDING PARTIES MUST INCLUDE THIS
NUMBER ON ALL FILINGS)**

March

Term, 2017

Month

Year

No. 00712

B. ETAL VS ROOSEVELT INN LLC ETAL

Name of Filing Party:

M. B. -PMNR

WILLIAM A. CALANDRA-PGRD

INDICATE NATURE OF DOCUMENT FILED:

- ☐ Petition (*Attach Rule to Show Cause*) ☒ Motion
☐ Answer to Petition ☐ Response to Motion

Has another petition/motion been decided in this case? ☐ Yes ☒ NoIs another petition/motion pending? ☐ Yes ☒ No

If the answer to either question is yes, you must identify the judge(s):

TYPE OF PETITION/MOTION (see list on reverse side)

MOT-FOR EXTRAORDINARY RELIEF

PETITION/MOTION CODE
(see list on reverse side)

MTEXR

ANSWER / RESPONSE FILED TO (Please insert the title of the corresponding petition/motion to which you are responding):

I. CASE PROGRAM

DAY FORWARD/MAJOR JURY PROGRAM

Name of Judicial Team Leader: JUDGE SHELLEY
ROBINS-NEW

Applicable Petition/Motion Deadline: N/A

Has deadline been previously extended by the Court: NO

II. PARTIES (required for proof of service)

(Name, address and **telephone number** of all counsel of record and unrepresented parties. Attach a stamped addressed envelope for each attorney of record and unrepresented party.)

NADEEM A BEZAR

KLINE & SPECTER, P.C. 1525 LOCUST
STREET, PHILADELPHIA PA 19102

JUSTINA L BYERS

ONE LOGAN SQUARE, PHILADELPHIA PA
19103

THOMAS P WAGNER

MARSHALL DENNEHEY WARNER COLEMAN &
GOGGIN 2000 MARKET STREET, 23RD FLOOR
, PHILADELPHIA PA 19103

III. OTHER

By filing this document and signing below, the moving party certifies that this motion, petition, answer or response along with all documents filed, will be served upon all counsel and unrepresented parties as required by rules of Court (see PA. R.C.P. 206.6, Note to 208.2(a), and 440). Furthermore, moving party verifies that the answers made herein are true and correct and understands that sanctions may be imposed for inaccurate or incomplete answers.

July 25, 2018

EMILY B. MARKS

(Attorney Signature/Unrepresented Party)

(Date)

(Print Name)

(Attorney I.D. No.)

**The Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date.
No extension of the Answer/Response Date will be granted even if the parties so stipulate.**

Civil Administration
E. MASCOLELLI

In the Court of Common Pleas of Philadelphia County
MOTION FOR EXTRAORDINARY RELIEF

(Check One Program)
☐ Commerce ☐ Mass Tort
☒ Day Forward/Major Jury ☐ Non-Jury
☐ Arbitration Appeal

CONTROL NUMBER

M.B., a minor by her Guardian, William A. Calandra, Esquire
Plaintiff(s)

March TERM, 2017
Month Year

VS.

Roosevelt Inn LLC, et. al.
Defendant(s)

No.: 00712

Filing of: M.B., a minor by her Guardian, William A. Calandra, Esquire
Name of Filing Party

☒ Plaintiff ☐ Movant
☐ Defendant ☐ Respondent

NAME OF PLAINTIFF AND COUNSEL
Thomas R. Kline, Esquire
Nadeem A. Bezar, Esquire
Emily B. Marks, Esquire
Kyle B. Nocho, Esquire
Kline & Spector
Attorneys for Plaintiff, M.B.
1525 Locust Street
Philadelphia, PA 19102

NAME OF DEFENDANT AND COUNSEL
See attached Certificate of Service

ASSIGNED TRACK (Check one)

☐ Expedited ☐ Complex
☒ Standard ☐ Extraordinary

CURRENT APPLICABLE CASE MANAGEMENT DEADLINES (Complete all dates subsequent to the date you are asking to be extended)

☒ Discovery Deadline October 1, 2018
☒ Expert Discovery November 5, 2018
☒ Motion Deadline after November 5, 2018
☒ Settlement Conference after January 7, 2019
☒ Pretrial Memo after February 4, 2019
☒ Trial Date

NAME OF JUDICIAL TEAM LEADER

J. Arnold New

SET FORTH DATES OF ISSUANCE OF ORDERS ON PREVIOUSLY FILED MOTIONS FOR EXTRAORDINARY RELIEF - ATTACH COPIES OF THOSE ORDERS

Case Management Order dated June 19, 2017 (attached as Exhibit A)

DESCRIBE RELIEF REQUESTED (Attach proposed Order, setting forth the current deadlines and proposed deadlines)

Set forth the efforts made to comply with the applicable deadlines; specify what needs to be done; set forth all relevant activity which has already been scheduled; and length and reason for the time requested.

This case involves the sex trafficking of Plaintiff, M.B. at the Roosevelt Inn motel when she was 14 years-old. Plaintiff has filed this Motion for Extraordinary Relief seeking a six (6) month extension of the standard track case management deadlines that were initially issued in this case. There has been no prior request for an extension of the case management deadlines.

Plaintiff filed a Complaint on March 10, 2017 against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel (hereinafter Roosevelt Defendants) as the owners, operators and managers of the Roosevelt Inn. Plaintiff's Complaint includes claims against the Roosevelt Defendants for violation of the Pennsylvania Human Trafficking Law, premise liability and negligent security. On September 5, 2017, Plaintiff filed an Amended Complaint adding the security company, Alpha-Centurion Security, Inc., as an additional defendant.

This case was assigned standard track case management deadlines. Plaintiff's request for additional time to conduct discovery and issue expert reports will effectively provide the parties with complex track case management deadlines which are appropriate and necessary for this complicated matter.

Plaintiff has diligently worked to exchange written discovery and documents relevant to this case. Plaintiff has reviewed thousands of pages of records, including voluminous law enforcement records, and has recently taken the deposition of Defendant, Roosevelt Inn's Corporate Designee. Plaintiff has also scheduled the depositions of pertinent witnesses which are upcoming within the next 30 days and has sent requests to schedule several additional witness depositions.

The Corporate Designee deposition of Defendant, Roosevelt Inn on July 19, 2018 revealed the need for further investigation and extensive ongoing discovery. At the corporate designee deposition, Plaintiff's counsel learned that the Roosevelt Inn Motel maintained a computer system (HSS) and a hard drive from a discarded Dell computer that the Roosevelt Defendants did not search for responsive documents to Plaintiff's discovery requests. Nor was there any search and retrieval of documents stored on the motel's premises that had been previously printed from the HSS system or Dell computer. As such, Plaintiff has propounded additional discovery including a request for a search and retrieval of all electronic material. The document retrieval would date back over the past 4 years, and ultimately produce hundreds if not thousands of pages of additional discovery. Plaintiff's counsel is also waiting for redactions and documentation on multiple requests to law enforcement. Additionally, Plaintiff's counsel is coordinating the logistics of taking the depositions of Abdul Lopez and Daiquan Davis who trafficked Plaintiff at the Roosevelt Inn. Mr. Davis is currently incarcerated in a federal prison in New Hampshire and Mr. Lopez is incarcerated in a federal prison in Arizona.

In addition to the extension of the discovery deadline, Plaintiff is also requesting that the deadline for Plaintiff's expert reports be set for thirty (30) days after the discovery deadline and that the defense expert deadline be set for thirty (30) days after the Plaintiff expert deadline. The staggered timeline for production of expert reports is consistent with deadlines associated with a Complex track case.

A COPY OF THIS MOTION WAS SENT OR WILL BE SENT TO THE FOLLOWING PARTIES OR COUNSEL ON THE FOLLOWING DATES:

(See attached Certificate of Service)

Response due: August 4, 2018 (within 10 days of filing of Motion)

I certify the above to be true and correct.

Respectfully submitted,

Date: July 25, 2018

Emily B. Marks, Esquire
Attorney for Plaintiff/Defendant

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the above Motion for Extraordinary Relief was served by electronic filing upon the following counsel of record:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.
Blank Rome LLP
One Logan Square
130 North 18th Street
Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.
Marshall Dennehey Warner Coleman & Goggin
2000 Market Street, Suite 2300
Philadelphia, PA 19103

Counsel for Defendant Alpha-Centurion Security, Inc.

By: 
EMILY B. MARKS, ESQUIRE
Attorney for Plaintiff

Dated: July 25, 2018

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
WILLIAM A. CALANDRA, ESQUIRE	:	COURT OF COMMON PLEAS
	:	
V.	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
ROOSEVELT INN LLC	:	NO.: 00712
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.	:	
	:	

ORDER

AND NOW, this day of , 2018, upon consideration of Minor-Plaintiff's Motion for Extraordinary Relief, it is hereby **ORDERED** and **DECREED** that the Motion is **GRANTED**. It is further ORDERED that the discovery, expert and motion deadlines are extended consistent with the following revised case management deadlines:

DISCOVERY DEADLINE:	4/1/19
PLAINTIFF EXPERT DEADLINE:	5/1/19
DEFENDANT EXPERT DEADLINE:	6/1/19
MOTION DEADLINE:	6/1/19
SETTLEMENT CONFERENCE:	6/1/19
PRETRIAL CONFERENCE:	7/1/19
TRIAL READY DATE:	8/1/19

BY THE COURT:

J.

EXHIBIT A



IN THE COURT OF COMMON PLEAS OF PHILADELPHIA COUNTY
FIRST JUDICIAL DISTRICT OF PENNSYLVANIA
TRIAL DIVISION – CIVIL

B. ETAL

VS

ROOSEVELT INN LLC ETAL

March Term 2017

No. 00712

DOCKETED
CIVIL CASE MANAGEMENT

JUN 19 2017

A. GIAMPAOLO

**CASE MANAGEMENT ORDER
STANDARD TRACK**

B. Etal Vs Roosevelt In-CMOIS



17030071200015

AND NOW, *Tuesday, June 20, 2017*, it is Ordered that:

1. The case management and time standards adopted for standard track cases shall be applicable to this case and are hereby incorporated into this Order.
2. All *discovery* on the above matter shall be completed not later than *01-OCT-2018*.
3. *Plaintiff* shall identify and submit *curriculum vitae and expert reports* of all expert witnesses intended to testify at trial to all other parties not later than *01-OCT-2018*.
4. *Defendant and any additional defendants* shall identify and submit *curriculum vitae and expert reports* of all expert witnesses intended to testify at trial not later than *05-NOV-2018*.
5. All *pre-trial motions* shall be filed not later than *05-NOV-2018*.
6. A *settlement conference* may be scheduled at any time after *05-NOV-2018*. Prior to the settlement conference all counsel shall serve all opposing counsel and file a settlement memorandum containing the following:
 - (a). A concise summary of the nature of the case if plaintiff or of the defense if defendant or additional defendant;
 - (b). A statement by the plaintiff or all damages accumulated, including an itemization of injuries and all special damages claimed by categories and amount;
 - (c). Defendant shall identify all applicable insurance carriers, together with applicable limits of liability.
7. A *pre-trial conference* will be scheduled any time after *07-JAN-2019*. Fifteen days prior to pre-trial conference, all counsel shall serve all opposing counsel and file a pre-trial memorandum containing the following:

- (a). A concise summary of the nature of the case if plaintiff or the defense if defendant or additional defendant;
 - (b). A list of all witnesses who may be called to testify at trial by name and address. Counsel should expect witnesses not listed to be precluded from testifying at trial;
 - (c). A list of all exhibits the party intends to offer into evidence. All exhibits shall be pre-numbered and shall be exchanged among counsel prior to the conference. Counsel should expect any exhibit not listed to be precluded at trial;
 - (d). Plaintiff shall list an itemization of injuries or damages sustained together with all special damages claimed by category and amount. This list shall include as appropriate, computations of all past lost earnings and future lost earning capacity or medical expenses together with any other unliquidated damages claimed; and
 - (e). Defendant shall state its position regarding damages and shall identify all applicable insurance carriers, together with applicable limits of liability;
 - (f). Each counsel shall provide an estimate of the anticipated length of trial.
8. *It is expected that the case will be ready for trial 04-FEB-2019*, and counsel should anticipate trial to begin expeditiously thereafter.
9. All counsel are under a continuing obligation and are hereby ordered to serve a copy of this order upon all unrepresented parties and upon all counsel entering an appearance subsequent to the entry of this Order.

BY THE COURT:



ARNOLD NEW, J.
TEAM LEADER

ADG97956(REV 11/04)

PHILADELPHIA COURT OF COMMON PLEAS PETITION/MOTION COVER SHEET

FOR COURT USE ONLY

ASSIGNED TO JUDGE:

ANSWER/RESPONSE DATE:

08/16/2018

*Do not send Judge courtesy copy of Petition/Motion/Answer/Response.
Status may be obtained online at <http://courts.phila.gov>*

CONTROL NUMBER:

18073433

**(RESPONDING PARTIES MUST INCLUDE THIS
NUMBER ON ALL FILINGS)**

March

Term, 2017

Month

Year

No. 00712

B. ETAL VS ROOSEVELT INN LLC ETAL

Name of Filing Party:

M. B. -PMNR

WILLIAM A. CALANDRA-PGRD

INDICATE NATURE OF DOCUMENT FILED:

- ☐ Petition (*Attach Rule to Show Cause*) ☒ Motion
☐ Answer to Petition ☐ Response to Motion

Has another petition/motion been decided in this case? ☐ Yes ☒ No

Is another petition/motion pending? ☐ Yes ☒ No

If the answer to either question is yes, you must identify the judge(s):

TYPE OF PETITION/MOTION (see list on reverse side)

MISCELLANEOUS MOTION/PETITION

PETITION/MOTION CODE
(see list on reverse side)

MTMIS

ANSWER / RESPONSE FILED TO (Please insert the title of the corresponding petition/motion to which you are responding):

I. CASE PROGRAM

DAY FORWARD/MAJOR JURY PROGRAM

Name of Judicial Team Leader: JUDGE SHELLEY
ROBINS-NEW

Applicable Petition/Motion Deadline: N/A

Has deadline been previously extended by the Court: NO

II. PARTIES (required for proof of service)

(Name, address and **telephone number** of all counsel of record and unrepresented parties. Attach a stamped addressed envelope for each attorney of record and unrepresented party.)

NADEEM A BEZAR

KLINE & SPECTER, P.C. 1525 LOCUST
STREET, PHILADELPHIA PA 19102

JUSTINA L BYERS

ONE LOGAN SQUARE, PHILADELPHIA PA
19103

THOMAS P WAGNER

MARSHALL DENNEHEY WARNER COLEMAN &
GOGGIN 2000 MARKET STREET, 23RD FLOOR
, PHILADELPHIA PA 19103

III. OTHER

By filing this document and signing below, the moving party certifies that this motion, petition, answer or response along with all documents filed, will be served upon all counsel and unrepresented parties as required by rules of Court (see PA. R.C.P. 206.6, Note to 208.2(a), and 440). Furthermore, moving party verifies that the answers made herein are true and correct and understands that sanctions may be imposed for inaccurate or incomplete answers.

July 27, 2018

EMILY B. MARKS

(Attorney Signature/Unrepresented Party)

(Date)

(Print Name)

(Attorney I.D. No.)

**The Petition, Motion and Answer or Response, if any, will be forwarded to the Court after the Answer/Response Date.
No extension of the Answer/Response Date will be granted even if the parties so stipulate.**

Civil Administration

E. MASCUILLI

M.B., minor by her Guardian, William A. Calandra, Esquire	:	PHILADELPHIA COUNTY COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
v.	:	
	:	NO. 00712
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	
Defendant	:	
and	:	
	:	
ALPHA-CENTURION SECURITY, INC.	:	
Additional Defendant :	:	

ORDER

AND NOW, this _____ day of _____, 2018, upon consideration of Plaintiff's Motion for Leave to File a Second Amended Complaint, and any response thereto, it is hereby **ORDERED** and **DECREED** that Plaintiff's Motion is **GRANTED**.

It is further **ORDERED** that Plaintiff may file an Amended Complaint consistent with the proposed Second Amended Complaint, as attached to Plaintiff's Motion as Exhibit "B".

BY THE COURT:

J.

KLINE & SPECTER, P.C.

Attorneys for Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
William A. Calandra, Esquire	:	COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
v.	:	
	:	NO. 00712
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	
Defendant	:	
and	:	
	:	
ALPHA-CENTURION SECURITY, INC.	:	
Additional Defendant :	:	

PLAINTIFF'S MOTION FOR LEAVE TO FILE A SECOND AMENDED COMPLAINT

1. This case involves the sex trafficking of Plaintiff, M.B. at the Roosevelt Inn motel when she was 14 years-old.

2. Plaintiff filed a Complaint on March 10, 2017 against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel (hereinafter "Roosevelt Defendants") as the owners, operators and managers of the Roosevelt Inn. Plaintiff's Complaint includes claims against the Roosevelt Defendants for violation of the Pennsylvania Human Trafficking Law, premise liability and negligent security.

3. During discovery, Plaintiff learned that Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn during the time Plaintiff was trafficked.

4. Plaintiff sought to file an Amended Complaint to join Alpha-Centurion Security, Inc. as an additional lawsuit.

5. Per Pennsylvania Rule of Civil Procedure 1033 a party, either by filed consent of the adverse party or by leave of court, may amend a pleading.

6. The Roosevelt Defendants stipulated and consented to Plaintiff filing an Amended Complaint to join Alpha-Centurion Security, Inc. as an additional defendant. See 7/17/17 Stipulation attached as Exhibit “A”.

7. On September 5, 2017, Plaintiff filed an Amended Complaint adding the security company, Alpha-Centurion Security, Inc., as an additional defendant.

8. Plaintiff now seeks leave to file a Second Amended Complaint to: 1) change the caption to remove reference to M.B. as a minor as she is now 18 years old and a Guardian Ad Litem is no longer necessary; 2) add factual averments surrounding Plaintiff being trafficked at the Roosevelt Inn; 3) add additional averments of negligence against the Roosevelt Defendants and; 4) remove a claim against additional Defendant Alpha-Centurion Security, Inc. under the Pennsylvania Human Trafficking Law.

9. Plaintiff does not seek to join an additional defendant.

10. A copy of Plaintiff’s proposed Second Amended Complaint is attached hereto as Exhibit “B”.

11. Plaintiff circulated a Stipulation and a copy of the proposed Second Amended Complaint to all parties for consent to file the Second Amended Complaint.

12. Counsel for Defendant Alpha-Centurion consented to the filing of the Second Amended Complaint but counsel for the Roosevelt Defendant will not provide consent. See

7/13/18 Letter from counsel for Defendant Alpha-Centurion Security, Inc. attached as Exhibit “C.

13. Plaintiff therefore, seeks permission from this Court to file a Second Amended Complaint.

14. Long-standing and well established Pennsylvania law makes clear that this Court should permit the Plaintiffs to amend their Complaint. Specifically, Pennsylvania Rule of Civil Procedure 1033 states:

A party, either by filed consent of the adverse party or by leave of court, may at any time change the form of action, add a person as a party, correct the name of a party, or otherwise amend a pleading. The amended pleading may aver transactions or occurrences which have happened before or after the filing of the original pleading, even though they give rise to a new cause of action or defense. An amendment may be made to conform the pleading to the evidence offered or admitted.

Pa. R. Civ. P. 1033.

15. In interpreting this Rule, courts in this Commonwealth have long held that leave to amend a pleading should be liberally granted at any stage of the litigation unless the amendment will violate the law or prejudice the opposing party. *See Berman v. Herrick*, 227 A.2d 840 (Pa. 1967); *Capobianchi v. Bic Corp.*, 666 A.2d 344, 345 (Pa. Super. 1995); *Gutierrez v. Pennsylvania Gas & Water Co.*, 507 A.2d 1230, 1232 (Pa. Super. 1986); *Gallo v. Yamaha Motor Corp., U.S.A.*, 335 Pa. Super. 311, 313, 484 A.2d 148, 150 (1984).

16. Indeed in *Capobianchi* the Superior Court explained that pursuant to Pa. R. Civ. P. 1033 courts should liberally grant leave to amend “after pleadings are closed, while a motion for judgment on the pleadings is pending, at trial, after judgment, or after an award has been made and an appeal taken therefrom.” *Capobianchi* at 345 (*quoting Biglan v. Biglan*, 479 A.2d 1021, 1025-1026 (Pa. Super. 1984).

17. Moreover, in *Gutierrez* the Superior Court stated:

It is well-settled that the decision to grant or deny permission to amend a pleading is a matter of judicial discretion. However, this discretion is not unfettered. Our courts have established as parameter a policy that amendments to pleadings will be liberally allowed to secure a determination of cases on their merits. Amendments should be allowed with great liberality at any stage of the case unless they violate the law or prejudice the rights of the opposing party.

Gutierrez, 507 A.2d at 1232 (internal citations omitted).

18. In determining whether the opposing party will be prejudiced by an amendment, Pennsylvania courts have made clear that: “prejudice must be something more than a detriment to the other party, for to make an advantage operate as a bar to amendment would be ‘to destroy the right to amend except in cases when the moving party would have no reason to amend.’” *Id.* at 1233 (citing *Tanner v. Allstate Insurance Co.* 467 A.2d 1164 (Pa. Super. 1983); *Sands v. Forrest*, 434 A.2d 122, 125 (Pa. Super 1981)).

19. Moreover, our jurisprudence has made clear that: “the mere fact that the adverse party has expended time and effort in preparing to try a case against the amending party is not such prejudice as to justify denying the amending party leave to amend” *Capobianchi*, 666 A.2d at 346 (quoting *James A. Mann, Inc. v. Upper Darby School Dist.*, 513 A.2d 528, 531 (Pa. Commw. Ct. 1986).

20. Furthermore, in *Gutierrez* the Superior Court explained that “a trial court’s denial of a petition to amend, based on nothing more than unreasonable delay, is an abuse of discretion.” *Gutierrez*, 507 A.2d at 1233.

21. In sum, it is a firmly entrenched principle of Pennsylvania law that: “in the absence of a proper and compelling ground for refusing the amendment, the lower court should grant leave to amend.” *Id.*

22. In the instant case, Plaintiff's proposed amendments are clearly within those permitted pursuant to Rule 1033 allowing amendments to a pleading.

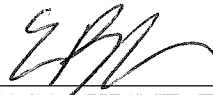
23. No party will suffer prejudice by the amendments to the Complaint, and amendment of the Complaint will not violate the law.

24. Trial will not be delayed since more than three months of discovery remain in this action and there are no new defendants or causes of action being added.

25. In addition, the statute of limitations has not passed for any of the Plaintiff's claims.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter the attached Order granting Plaintiff leave to file a Second Amended Complaint in the above-captioned matter.

KLINE & SPECTER, P.C.

BY: 
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE

KLINE & SPECTER, P.C.

Attorneys for Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 KYLE B. NOCHO, ESQUIRE/319270

1525 Locust Street
 Philadelphia, Pennsylvania 19102
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M.B., minor by her Guardian,	:	PHILADELPHIA COUNTY
William A. Calandra, Esquire	:	COURT OF COMMON PLEAS
	:	
Plaintiff,	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
v.	:	
	:	NO. 00712
ROOSEVELT INN LLC	:	
d/b/a ROOSEVELT INN and	:	
ROOSEVELT INN CAFÉ, et al.,	:	
Defendant	:	
and	:	
	:	
ALPHA-CENTURION SECURITY, INC.	:	
Additional Defendant :	:	

**PLAINTIFF'S MEMORANDUM OF LAW IN SUPPORT OF MOTION FOR LEAVE TO
 FILE A SECOND AMENDED COMPLAINT**

I. PRELIMINARY STATEMENT

Plaintiff seeks leave to file a Second Amended Complaint. The Second Amended Complaint does not add any additional defendants nor does it raise any new causes of action. Instead, the Second Amended Complaint merely removes references to the Plaintiff as a minor as she is now 18 years-old; adds factual averments surrounding the sex trafficking of Plaintiff at the Roosevelt Inn; and also includes additional averments of negligence against the Defendants. There is no prejudice to any of the parties and the filing of an Amended Complaint will not cause any delay of this case. Further, the statute of limitations has not passed for any of Plaintiff's claims.

II. QUESTION PRESENTED

Whether Plaintiff should be permitted to amend her Complaint pursuant to Rule 1033 of the Pennsylvania Rule of Civil Procedure.

Suggested Answer: Yes, because Pennsylvania amendments must be freely and liberally permitted at any point during the litigation; and none of the Defendants are prejudiced by the amendments.

III. BRIEF FACTUAL AND PROCEDURAL HISTORY

This case involves the sex trafficking of Plaintiff, M.B. at the Roosevelt Inn motel when she was 14 years-old. Plaintiff filed a Complaint on March 10, 2017 against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel (hereinafter “Roosevelt Defendants”) as the owners, operators and managers of the Roosevelt Inn. Plaintiff’s Complaint includes claims against the Roosevelt Defendants for violation of the Pennsylvania Human Trafficking Law, premise liability and negligent security.

During discovery, Plaintiff learned that Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn during the time Plaintiff was trafficked. Plaintiff sought to file an Amended Complaint to join Alpha-Centurion Security, Inc. as an additional lawsuit. Per Pennsylvania Rule of Civil Procedure 1033 a party, either by filed consent of the adverse party or by leave of court, may amend a pleading. The Roosevelt Defendants stipulated and consented to Plaintiff filing an Amended Complaint to join Alpha-Centurion Security, Inc. as an additional defendant. See 7/17/17 Stipulation attached as Exhibit “A”. On September 5, 2017, Plaintiff filed an Amended Complaint adding the security company, Alpha-Centurion Security, Inc., as an additional defendant.

Plaintiff now seeks leave to file a Second Amended Complaint to: 1) change the caption to remove reference to M.B. as a minor as she is now 18 years old and a Guardian Ad Litem is

no longer necessary; 2) add factual averments surrounding Plaintiff being trafficked at the Roosevelt Inn; 3) add additional averments of negligence against the Roosevelt Defendants and; 4) remove a claim against Additional Defendant Alpha-Centurion Security, Inc. under the Pennsylvania Human Trafficking Law. Plaintiff does not seek to join an additional defendant. A copy of Plaintiff's proposed Second Amended Complaint is attached hereto as Exhibit "B".

Plaintiff circulated a Stipulation and a copy of the proposed Second Amended Complaint to all parties for consent to file the Second Amended Complaint. Counsel for Defendant Alpha-Centurion consented to the filing of the Second Amended Complaint but Counsel for the Roosevelt Defendant will not provide consent. See 7/13/18 Letter from Counsel for Defendant Alpha-Centurion Security, Inc. attached as Exhibit "C".

IV. NONE OF THE DEFENDANTS WILL BE PREJUDICED BY THE FILING OF PLAINTIFF'S SECOND AMENDED COMPLAINT AND AMENDMENTS MUST BE FREELY AND LIBERALLY PERMITTED

Long-standing and well established Pennsylvania law makes clear that this Court should permit the Plaintiffs to amend their Complaint. Specifically, Pennsylvania Rule of Civil Procedure 1033 states:

A party, either by filed consent of the adverse party or by leave of court, may at any time change the form of action, add a person as a party, correct the name of a party, or otherwise amend a pleading. The amended pleading may aver transactions or occurrences which have happened before or after the filing of the original pleading, even though they give rise to a new cause of action or defense. An amendment may be made to conform the pleading to the evidence offered or admitted.

Pa. R. Civ. P. 1033.

In interpreting this Rule, courts in this Commonwealth have long held that leave to amend a pleading should be liberally granted at any stage of the litigation unless the amendment will violate the law or prejudice the opposing party. *See Berman v. Herrick*, 227 A.2d 840 (Pa. 1967); *Capobianchi v. Bic Corp.*, 666 A.2d 344, 345 (Pa. Super. 1995); *Gutierrez v.*

Pennsylvania Gas & Water Co., 507 A.2d 1230, 1232 (Pa. Super. 1986); *Gallo v. Yamaha Motor Corp., U.S.A.*, 335 Pa. Super. 311, 313, 484 A.2d 148, 150 (1984).

Indeed in *Capobianchi* the Superior Court explained that pursuant to Pa. R. Civ. P. 1033 courts should liberally grant leave to amend “after pleadings are closed, while a motion for judgment on the pleadings is pending, at trial, after judgment, or after an award has been made and an appeal taken therefrom.” *Capobianchi* at 345 (quoting *Biglan v. Biglan*, 479 A.2d 1021, 1025-1026 (Pa. Super. 1984)). Moreover, in *Gutierrez* the Superior Court stated:

It is well-settled that the decision to grant or deny permission to amend a pleading is a matter of judicial discretion. However, this discretion is not unfettered. Our courts have established as parameter a policy that amendments to pleadings will be liberally allowed to secure a determination of cases on their merits. Amendments should be allowed with great liberality at any stage of the case unless they violate the law or prejudice the rights of the opposing party.

Gutierrez, 507 A.2d at 1232 (internal citations omitted).

In determining whether the opposing party will be prejudiced by an amendment, Pennsylvania courts have made clear that: “prejudice must be something more than a detriment to the other party, for to make an advantage operate as a bar to amendment would be ‘to destroy the right to amend except in cases when the moving party would have no reason to amend.’” *Id.* at 1233 (citing *Tanner v. Allstate Insurance Co.* 467 A.2d 1164 (Pa. Super. 1983); *Sands v. Forrest*, 434 A.2d 122, 125 (Pa. Super 1981)).

Moreover, our jurisprudence has made clear that: “the mere fact that the adverse party has expended time and effort in preparing to try a case against the amending party is not such prejudice as to justify denying the amending party leave to amend” *Capobianchi*, 666 A.2d at 346 (quoting *James A. Mann, Inc. v. Upper Darby School Dist.*, 513 A.2d 528, 531 (Pa. Commw. Ct. 1986)).


Furthermore, in *Gutierrez* the Superior Court explained that “a trial court’s denial of a petition to amend, based on nothing more than unreasonable delay, is an abuse of discretion.” *Gutierrez*, 507 A.2d at 1233. In sum, it is a firmly entrenched principle of Pennsylvania law that: “in the absence of a proper and compelling ground for refusing the amendment, the lower court should grant leave to amend.” *Id.*

In the instant case, Plaintiff’s proposed amendments are clearly within those permitted pursuant to Rule 1033 allowing amendments to a pleading. No party will suffer prejudice by the amendments to the Complaint, and amendment of the Complaint will not violate the law. Trial will not be delayed since more than three months of discovery remain in this action and there are no new defendants or causes of action being added. In addition, the statute of limitations has not passed for any of Plaintiff’s claims.

V. CONCLUSION

For all the aforementioned reasons, Plaintiff respectfully requests this Honorable Court to enter the attached Order granting Plaintiff leave to file a Second Amended Complaint in the above-captioned matter.

KLINE & SPECTER, P.C.

BY: 
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
KYLE B. NOCHO, ESQUIRE

CERTIFICATE OF SERVICE

I do hereby certify that service of a true and correct copy of the above Plaintiff's Motion For Leave to file Second Amended Complaint was filed with the Court on July 27, 2018 and served by electronic filing upon counsel of record:

Grant S. Palmer, Esq.
James J. Quinlan, Esq.
Justina L. Byers, Esq.
Daniel E. Oberdick, Esq.

Blank Rome LLP

One Logan Square
130 North 18th Street

Philadelphia, PA 19103

*Counsel for Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc.,
UFVS Management Company, LLC and Yagna Patel*

Thomas P. Wagner, Esq.
Robert W. Stanko, Esq.
Melanie J. Foreman, Esq.

Marshall Dennehey Warner Coleman & Goggin

2000 Market Street, Suite 2300

Philadelphia, PA 19103

Counsel for Defendant Alpha-Centurion Security, Inc.

By: _____



EMILY B. MARKS, ESQUIRE
Attorney for Minor-Plaintiffs

VERIFICATION

I, EMILY B. MARKS, ESQUIRE, hereby state that I am the attorney for the Plaintiffs in this matter and hereby verify that the statements made in the foregoing Plaintiff's Motion for Leave to File Second Amended Complaint, are true and correct to the best of my knowledge, information and belief.

The undersigned that the statements contained therein are made subject to the penalties of 18 Pa. C.S. § 4904 relating to unsworn falsification to authorities.



EMILY B. MARKS, ESQUIRE

EXHIBIT A

M.B., minor by her Guardian,
WILLIAM A. CALANDRA, ESQUIRE
Plaintiff,

V.

ROOSEVELT INN LLC
d/b/a ROOSEVELT INN and
ROOSEVELT INN CAFE
and
ROOSEVELT MOTOR INN, INC.
d/b/a ROOSEVELT MOTOR INN
and
UFVS MANAGEMENT COMPANY, LLC
and
YAGNA PATEL

Defendants

Filed and Attested by the
PHILADELPHIA COUNTY Judicial Records
COURT OF COMMON PLEAS
C. FORTE
JUL 20 2021 10:05 am

CIVIL TRIAL DIVISION
MARCH TERM, 2017
NO.: 00712

JURY TRIAL DEMANDED

STIPULATION

BY WAY OF STIPULATION AND AGREEMENT, amongst the parties by the signatures of the undersigned counsel, it is hereby **STIPULATED AND AGREED** by consent of the parties that Minor-Plaintiff M.B., by and through her Guardian William A. Calandra, Esquire shall and may amend the Complaint to name Alpha-Centurion Security, Inc., possibly otherwise known as Alpha Century Security, Inc., as a defendant.

KLINE & SPECTER, P.C.

Naadeem A. Bazar
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE
*Attorneys for Minor-Plaintiff M.B.,
Minor by her Guardian, William A.
Calandra, Esquire*

Date:

7/7/17

BLANK ROMELLO

Grant S. Palmer
GRANT S. PALMER, ESQUIRE
JAMES J. QUINLAN, ESQUIRE
JUSTINA L. BYERS, ESQUIRE
DANIEL E. OBERDICK, ESQUIRE
*Attorneys for Defendants Roosevelt Inn
LLC d/b/a Roosevelt Inn and Roosevelt Inn
Café, Roosevelt Motor Inn, Inc. d/b/a
Roosevelt Motor Inn, UFVS Management
Company, LLC and Yagna Patel*

Date:

7/17/17

Case ID: 170300712

Case ID: 170300712

Control No.: 18073433

EXHIBIT B

KLINE & SPECTER, P.C.

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405

1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

Attorneys for Plaintiff

M.B.	:	PHILADELPHIA COUNTY
c/o Kline & Specter, P.C.	:	COURT OF COMMON PLEAS
1525 Locust Street	:	
Philadelphia, PA 19102	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
Plaintiff,	:	NO.: 00712
	:	
V.	:	
	:	
ROOSEVELT INN LLC	:	JURY TRIAL DEMANDED
<i>d/b/a ROOSEVELT INN and</i>	:	
<i>ROOSEVELT INN CAFE</i>	:	
7630 Roosevelt Boulevard	:	
Philadelphia, PA 19152	:	
	:	
and	:	
	:	
ROOSEVELT MOTOR INN, INC.	:	
<i>d/b/a ROOSEVELT MOTOR INN</i>	:	
7630 Roosevelt Boulevard	:	
Philadelphia, PA 19152	:	
	:	
and	:	
	:	
UFVS MANAGEMENT COMPANY, LLC	:	
287 Bowman Avenue	:	
Purchase, NY 10577	:	
	:	
and	:	
	:	
YAGNA PATEL	:	
7630 Roosevelt Boulevard	:	
Philadelphia, PA 19152	:	
	:	
and	:	
	:	
ALPHA-CENTURION SECURITY, INC.	:	
3720 West Chester Pike	:	
Newtown Square, PA 19073	:	

Defendants :

NOTICE TO DEFEND

NOTICE

You have been sued in court. If you wish to defend against the claims set forth in the following pages, you must take action within twenty (20) days after this complaint and notice are served, by entering a written appearance personally or by attorney and filing in writing with the court your defenses or objections to the claims set forth against you. You are warned that if you fail to do so the case may proceed without you and a judgment may be entered against you by the court without further notice for any money claimed in the complaint or for any other claim or relief requested by the plaintiff. You may lose money or property or other rights important to you.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER (OR CANNOT AFFORD ONE), GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW TO FIND OUT WHERE YOU CAN GET LEGAL HELP.

THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER.

IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

LAWYERS REFERENCE SERVICE
One Reading Center
Philadelphia, PA 19107
(215) 238-6333
TTY(215) 451-6197

AVISO

Le han demandado en corte. Si usted quiere defenderse contra las demandas nombradas en las paginas siguientes, tiene veinte (20) dias a partir de recibir esta demanda y notificacion para entablar personalmente o por un abogado una comparecencia escrita y tambien para entablar con la corte en forma escrita sus defensas y objeciones a las demandas contra usted. Sea avisado que si usted no se defiende, el caso puede continuar sin usted y la corte puede incorporar un juicio contra usted sin previo aviso para conseguir el dinero demandado en el pleito o para conseguir cualquier otra demanda o alivio solicitados por el demandante. Usted puede perder dinero o propiedad u otros derechos importantes para usted._

USTED DEBE LLEVAR ESTE DOCUMENTO A SU ABOGADO INMEDIATAMENTE. SI USTED NO TIENE ABOGADO (O NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO), VAYA EN PERSONA O LLAME POR TELEFONO LA OFICINA NOMBRADA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL. ESTA OFICINA PUEDE PROPORCIONARLE LA INFORMACION SOBRE CONTRATAR A UN ABOGADO.

SI USTED NO TIENE DINERO SUFICIENTE PARA PAGAR A UN ABOGADO, ESTA OFICINA PUEDE PROPORCIONARLE INFORMACION SOBRE AGENCIAS QUE OFRECEN SERVICIOS LEGALES A PERSONAS QUE CUMPLEN LOS REQUISITOS PARA UN HONORARIO REDUCIDO O NINGUN HONORARIO.

SERVICIO de REFERENCIA LEGAL
Uno Reading Centro
Filadelfia, PA 19107
Telefono: (215) 238-6333
TTY(215) 451-6197

KLINE & SPECTER, P.C.

Attorneys for Plaintiff

BY: THOMAS R. KLINE, ESQUIRE/28895
 NADEEM A. BEZAR, ESQUIRE/63577
 EMILY B. MARKS, ESQUIRE/204405
 1525 Locust Street
 Philadelphia, Pennsylvania 19102
 (215) 772-1000

M.B.	:	PHILADELPHIA COUNTY
c/o Kline & Specter, P.C.	:	COURT OF COMMON PLEAS
1525 Locust Street	:	
Philadelphia, PA 19102	:	CIVIL TRIAL DIVISION
	:	MARCH TERM, 2017
Plaintiff,	:	NO.:00712
v.	:	
	:	
ROOSEVELT INN LLC	:	JURY TRIAL DEMANDED
<i>d/b/a ROOSEVELT INN and</i>	:	
<i>ROOSEVELT INN CAFE</i>	:	
7630 Roosevelt Boulevard	:	
Philadelphia, PA 19152	:	
	:	
and	:	
	:	
ROOSEVELT MOTOR INN, INC.	:	
<i>d/b/a ROOSEVELT MOTOR INN</i>	:	
7630 Roosevelt Boulevard	:	
Philadelphia, PA 19152	:	
	:	
and	:	
	:	
UFVS MANAGEMENT COMPANY, LLC	:	
287 Bowman Avenue	:	
Purchase, NY 10577	:	
	:	
and	:	
	:	
YAGNA PATEL	:	
7630 Roosevelt Boulevard	:	
Philadelphia, PA 19152	:	
	:	
and	:	
	:	
ALPHA-CENTURION SECURITY, INC.	:	
3720 West Chester Pike	:	
Newtown Square, PA 19073	:	

Defendants :

PLAINTIFF'S SECOND AMENDED COMPLAINT

PRELIMINARY STATEMENT

1. Human sex trafficking is a form of modern day slavery that exists throughout the United States and globally. It is a form of evil in the abuse and exploitation of the most innocent and vulnerable.

2. Since 2007 over 17,000 incidents of sex trafficking in the United States have been reported to the National Human Trafficking Resources Center. Over 1,200 cases of sex trafficking has been reported in the first six months of 2016, with the vast majority of victims being women and a disproportionate number being minors.

3. In 2014, the Commonwealth of Pennsylvania extensively revised its human trafficking law to compensate the victims and ensure that anyone or any entity that knowingly markets or provides its goods or services to sex traffickers is civilly liable.

THE PARTIES

4. Plaintiff, M.B., was born on September 3, 1999 and is one of the thousands of victims of human trafficking in the United States. In 2014, Plaintiff was exploited as a minor by commercial sex traffickers who financially benefitted from her exploitation. Plaintiff resides in Philadelphia County, Pennsylvania. Plaintiff can be contacted through her counsel, Thomas R. Kline, Esquire, Nadeem A. Bezar, Esquire, and Emily B. Marks, Esquire of Kline & Specter, P.C., 1525 Locust Street, Philadelphia, Pennsylvania 19102.

5. Plaintiff's name and address are not contained in this Complaint so as to protect the privacy and identity of Plaintiff M.B. who incurred injuries and damages starting when she

was fourteen (14) years old. See also Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts § 7.0.

6. Defendant Roosevelt Inn LLC d/b/a Roosevelt Inn and Roosevelt Inn Cafe [hereinafter referred to as “Roosevelt Inn LLC”] is a limited liability company organized and existing under the laws of Delaware. At all material times hereto, Defendant Roosevelt Inn LLC owned, operated or managed a motel located at 7630 Roosevelt Boulevard, Philadelphia, PA 19152 [hereinafter referred to as the “Roosevelt Inn”].

7. Defendant Roosevelt Motor Inn, Inc. d/b/a Roosevelt Motor Inn [hereinafter referred to as “Roosevelt Motor Inn, Inc.”] is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Roosevelt Motor Inn, Inc. owned, operated or managed the Roosevelt Inn.

8. Defendant UFVS Management Company, LLC, is a limited liability company duly organized and existing under the laws of the State of New York. At all material times hereto, Defendant UFVS Management Company LLC owned, operated and/or managed the Roosevelt Inn.

9. Defendant Yagna Patel is an adult person and resident of Pennsylvania who resides at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania, PA 19152. Based on information and belief, Mr. Patel owned, operated and/or managed the Roosevelt Inn.

10. Defendant Alpha-Centurion Security, Inc. is a corporation duly organized and existing under the laws of the Commonwealth of Pennsylvania. At all material times hereto, Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn.

11. Upon information and belief, at all times relevant hereto, Defendant Alpha-Centurion Security, Inc. provided paid for security and related services at the Roosevelt Inn

located at 7630 Roosevelt Boulevard, Philadelphia, Pennsylvania 19152, incidental to a contractual arrangement as between itself and the owners and operators of the premises: Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel.

12. Defendant Alpha-Centurion Security, Inc. occupied, controlled, patrolled, monitored and assumed responsibility for security of the premises located at the Roosevelt Inn, 7630 Roosevelt Boulevard, Philadelphia, PA 19152.

13. Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn and assumed responsibility for ensuring the safety and well-being of individuals lawfully on the premises, including Plaintiff, M.B.

14. Venue is appropriate in this case because Defendant Yagna Patel resides in Philadelphia County and Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC, and Alpha-Centurion Security, Inc. regularly conduct business in Philadelphia County. Venue is also proper in this case because Pennsylvania's human trafficking law, 18 Pa. C.S.A. § 3051, permits victims of human trafficking and the sex trade to bring suit in the county in which the victim resides. Plaintiff M.B. resides in Philadelphia County. Therefore, venue is proper in the Philadelphia County Court of Common Pleas.

15. At all times material hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel acted individually and/or by and through their actual or apparent agents, servants and employees, including but not limited to front desk staff, back room staff, housekeepers, custodians, maintenance workers, food preparation workers, doorman, concierges and security guards and are therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency,

master-servant, respondent superior and/or right of control.

16. At all times material hereto, Alpha-Centurion Security, Inc. acted individually and/or by and through its actual or apparent agents, servants and employees, including but not limited to security guards and is therefore liable for the acts and/or omissions of their agents, servants and/or employees under theories of agency, master-servant, respondent superior and/or right of control.

17. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel individually and/or by their actual or apparent agents, servants and employees were uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn where they worked.

18. At all material times hereto, Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, was uniquely positioned to observe the manifestations, indications and evincement of human sex trafficking within the Roosevelt Inn.

19. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel individually and/or by their actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur.

20. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to take any steps to prevent human sex trafficking at the Roosevelt Inn and instead permitted heinous and unspeakable acts to occur.

21. At all material times hereto, Defendants Roosevelt Inn LLC, Roosevelt Motor

Inn, Inc., UFVS Management Company, LLC and Yagna Patel individually and/or by their actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

22. At all material times hereto, Defendant Alpha-Centurion Security, Inc., individually and/or by its actual or apparent agents, servants and employees, failed to report to authorities that human sex trafficking was occurring at the Roosevelt Inn.

23. At all material times hereto, Defendants Roosevelt, Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel knowingly rented rooms to sex traffickers benefiting from the commercial sex acts occurring on the premises of the Roosevelt Inn.

24. At all material times hereto, Defendant Alpha-Centurion Security, Inc. knowingly provided its security and related services at the Roosevelt Inn, while having knowledge of the commercial sex acts occurring on the premises of the Roosevelt Inn.

OPERATIVE FACTS

25. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3011, et. seq. it is a felony to recruit, entice, solicit, harbor, or transport a minor which results in the minor being subjected to sexual servitude.

26. Hotels and motels are common venues for sex trafficking, due to ease of access for buyers and traffickers, ability to pay in cash and maintain financial anonymity, and the avoidance of building and maintenance fees. Hotels and motels are a convenient place for customers to purchase sex to avoid detection. Indeed, since 2007, 1,434 cases of human trafficking in hotels and motels have been reported to the National Human Trafficking Resource Center (NHTRC).

27. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees knew or should have known that sex crimes were occurring at the Roosevelt Inn. From January 2012 through December 2017, the Philadelphia Police Department documented more than one thousand incidents of criminal activity at and/or near the Roosevelt Inn including aggravated assault, domestic abuse, theft, weapon violations, rape, prostitution, drug offenses, disorderly conduct and a video recorded shooting.

28. While investigating and making arrests of perpetrators of prostitution at the Roosevelt Inn, the Philadelphia Police Department would regularly collect up to eight key cards from a single guest involved in prostitution.

29. Philadelphia Police Department records note, on at least one occasion, that a female guest told a police officer that she would receive texts from a security guard at the Roosevelt Inn, warning of any police activity that would expose her to potential arrest.

30. Commencing in 2014, Plaintiff was recruited, enticed, solicited, harbored and/or transported to engage in commercial sex acts by sex traffickers to engage in commercial sex acts at the Roosevelt Inn on a regular, consistent and/or repeated basis.

31. Under Pennsylvania's Human Trafficking Law, 18 Pa. C.S. § 3051, a person or entity can be civilly liable for knowingly marketing or providing its goods or services to a sex trafficker.

32. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, regularly rented or otherwise provided rooms and services at the Roosevelt Inn to traffickers engaged in commercial sex acts with Plaintiff when she was a minor.

33. Upon information and belief, Defendant Alpha-Centurion Security, Inc. contracted with the Roosevelt Inn beginning in approximately March 2007 to provide security services.

34. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, was hired to ensure the safety and well-being of individuals lawfully on the motel's premises, the motel's guests, the motel's employees, and the motel's property.

35. By providing security services, Defendant Alpha-Centurion Security, Inc. assumed responsibility for ensuring the safety and well-being of individuals lawfully present at the Roosevelt Inn, including Plaintiff.

36. It is believed and therefore averred that all of the responsibilities as aforesaid were well within the scope of the contractual responsibilities promised and undertaken by Defendant Alpha-Centurion Security, Inc. as part of its agreement to provide security services on the premises of the Roosevelt Inn.

37. Defendant Alpha-Centurion Security, assumed responsibility for protecting individuals lawfully present at the Roosevelt Inn, including Plaintiff from foreseeable harm, including commercial sex exploitation and human sex trafficking.

38. Having undertaken responsibilities as aforesaid, Defendant Alpha-Centurion Security owed a duty to Plaintiff to provide a reasonably safe environment at the Roosevelt Inn and protect Plaintiff from dangerous people and conditions on the premises.

39. Defendant Alpha-Centurion Security, Inc. provided security services, while traffickers used the rooms at the Roosevelt Inn to engage in commercial sex acts with Plaintiff when she was a minor.

40. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants, and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to individuals trafficking Plaintiff for commercial sex acts.

41. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that rooms and services were being rented or otherwise provided to individuals trafficking Plaintiff for commercial sex acts, while Alpha-Centurion Security, Inc. had a duty to protect individuals lawfully present at the Roosevelt Inn, like Plaintiff.

42. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that Plaintiff was being sexually exploited.

43. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, knew or had constructive knowledge that Plaintiff was being sexually exploited.

44. Plaintiff's traffickers put up internet advertisements for the purpose of sex trafficking Plaintiff as a minor.

45. The advertisements included a fake name for Plaintiff and a phone number to call.

46. During the phone call, sex for cash was negotiated and the caller "John" would be informed that Plaintiff was at the Roosevelt Inn.

47. The "John" who negotiated to have sex for cash with Plaintiff would then speak to

the front desk clerk at the Roosevelt Inn.

48. An individual named “Abdul” would hold himself out as the clerk, staff member or employee at the Roosevelt Inn. The complete name of “Abdul” is known to Defendants.

49. “Abdul” would then direct the individual to the floor and room where Plaintiff and her traffickers were staying.

50. “Abdul” was fully aware that Plaintiff who was a minor and other underage children were compelled to perform sex for money at the Roosevelt Inn.

51. Plaintiff’s traffickers would linger in the halls and on the premises of the Roosevelt Inn.

52. The motel room where Plaintiff engaged in commercial sex acts contained used condoms and condom wrappers and the room frequently smelled of marijuana.

53. Plaintiff engaged in numerous commercial sex acts and/or “dates” per day.

54. Plaintiff was accompanied by older men while on the premises of the Roosevelt Inn.

55. Housekeepers and front desk staff including “Abdul” at the Roosevelt Inn had conversations with Plaintiff and had knowledge that Plaintiff was staying at the Roosevelt Inn to engage in commercial sex acts.

56. Plaintiff was visibly treated in an aggressive manner by traffickers engaged in commercial sex acts with Plaintiff while in public areas of the Roosevelt Inn.

57. Plaintiff exhibited fear and anxiety while on the premises and in public areas of the Roosevelt Inn.

58. Plaintiff’s traffickers paid cash for the motel rooms where Plaintiff engaged in commercial sex acts.

59. Plaintiff's traffickers consistently displayed "Do Not Disturb" signs on the door to the motel where Plaintiff engaged in commercial sex acts and consistently refused housekeeping services.

60. Men and other minors frequently entered and left the rooms where Plaintiff engaged in commercial sex acts.

61. Men stood in the hallways outside of rooms where Plaintiff was engaged in commercial sex acts.

62. Plaintiff had extended stays at the Roosevelt Inn with few or no personal possessions and was left in the room for long periods of time.

63. Plaintiff dressed in a sexually explicit manner and would walk the hallways of the Roosevelt Inn.

64. Security guards and/or employees of Defendant Alpha-Centurion Security, Inc. observed Plaintiff who was a minor at the time at the Roosevelt Inn in sexually explicit clothing.

65. Plaintiff was paid cash for the commercial sex acts she engaged in while at the Roosevelt Inn.

66. On at least one occasion, Yagna Patel came to the room occupied by the Plaintiff and was handed money by one of her traffickers.

67. Plaintiff distributed the cash she received for the commercial sex acts to her traffickers who used the cash to pay for the motel rooms rented at the Roosevelt Inn.

68. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, failed to report to authorities, intervene, disrupt or

otherwise stop the human sex trafficking of the Plaintiff.

69. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel knowingly rented rooms to sex traffickers exploiting Plaintiff at the Roosevelt Inn.

70. Plaintiff, as a guest at the Roosevelt Inn, was a business invitee of Defendants Roosevelt Inn, LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel.

71. Defendants Roosevelt Inn, LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants, and employees, owed a duty to Plaintiff, as motel guest, to exercise reasonable care to protect against criminal conduct.

72. Defendants Roosevelt Inn, LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, knew or had constructive knowledge that they were renting or otherwise providing rooms and services to persons who were trafficking Plaintiff.

73. Defendants Roosevelt Inn, LLC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees knew or had constructive knowledge that Plaintiff was being sexually exploited.

74. Despite knowledge, constructive knowledge and general awareness of the signs of human trafficking, Defendants Roosevelt Inn, LLC., Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees failed to protect Plaintiff, as a business invitee, from

criminal conduct.

75. Upon information and belief, Defendant Alpha-Centurion Security, Inc. contracted with the Roosevelt Inn beginning in approximately March 2007 to provide security services. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, was hired or contracted to ensure the safety and well-being of individuals on the motel's premises, the motel's guests, the motel's employees and the motel's property.

76. By providing security services, Defendant Alpha-Centurion Security, Inc. assumed responsibility for ensuring the safety and well-being of individuals on the premises of the Roosevelt Inn, including Plaintiff.

77. Defendant Alpha-Centurion Security, Inc. assumed responsibility for protecting individuals present at the Roosevelt Inn, including Plaintiff, from foreseeable harm including commercial sex exploitation and human sex trafficking.

78. Having undertaken aforesaid responsibilities and contractual obligations, Defendant Alpha Centurion owed a duty to Plaintiff to provide a reasonably safe environment at the Roosevelt Inn and protect Plaintiff from dangerous people and conditions on the premises.

79. Defendant Alpha-Centurion Security, Inc. provided security services at the Roosevelt Inn, while having knowledge of the commercial sex acts committed on the premises of the Roosevelt Inn through the renting of rooms.

80. By knowingly renting rooms to individuals sex trafficking Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees caused Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish,

humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

81. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, caused Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life, and loss of life's pleasures both in the past and in the future.

82. By knowingly renting rooms to individuals sex trafficking Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees failed to report, intervene, disrupt or otherwise stop sex trafficking occurring on the premises of the Roosevelt Inn.

83. By having knowledge of human sex trafficking at the Roosevelt Inn and negligently allowing the Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, failed to report, intervene, disrupt or otherwise stop the practice.

84. By knowingly renting rooms to individuals sex trafficking Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

85. By having knowledge of human sex trafficking at the Roosevelt Inn and

negligently allowing the Plaintiff's harm to occur, Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

**COUNT I – CIVIL LIABILITY UNDER THE PENNSYLVANIA HUMAN
TRAFFICKING LAW, 18 Pa. C.S.A. § 3051**

**M.B. v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS
MANAGEMENT COMPANY, LLC, YAGNA PATEL**

86. The averments of Paragraphs 1 through 85 are incorporated herein by reference.

87. Pennsylvania's Human Trafficking Law 18 PA C.S.A. § 3051 creates civil liability for people or entities who knowingly market or provide their goods and services to sex traffickers.

88. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, did knowingly rent rooms to individuals sex trafficking Plaintiff as minor, which resulted in her being sex trafficked and sexually exploited.

89. By knowingly renting rooms to individuals sex trafficking Plaintiff for commercial sex acts, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, caused Plaintiff to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

90. By knowingly renting rooms to individuals sex trafficking the Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC,

and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, failed to report, intervene, disrupt or otherwise stop sex trafficking on the premises of the Roosevelt Inn.

91. By knowingly renting rooms to individuals sex trafficking Plaintiff, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT II - NEGLIGENCE

**M.B. v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS
MANAGEMENT COMPANY, LLC, YAGNA PATEL**

92. The averments of Paragraphs 1 through 91 are incorporated herein by reference.

93. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, were under a duty to provide reasonable, adequate, and sufficient security personnel and/or to otherwise take appropriate steps to ensure the safety and protection of persons on the premises of the Roosevelt Inn.

94. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent

agents, servants and employees should have reasonably anticipated criminal conduct by third parties, including other guests, invitees or persons on the premises of the Roosevelt Inn.

95. Defendants Roosevelt Inn LCC, Roosevelt Motor Inn, Inc. UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, had a duty to take precautions against reasonably anticipated criminal conduct by third parties and to operate the Roosevelt Inn in a manner that did not endanger children or other persons, including Plaintiff. Moreover, the Defendants had a duty of care to take reasonable steps to protect foreseeable victims of the dangers created by their acts and omissions, including the danger of human trafficking and sexual exploitation on the premises of the Roosevelt Inn.

96. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, breached the foregoing duties because they knew or should have known that persons on the premises of the Roosevelt Inn, including Plaintiff, could be victimized by, or subjected to, criminal activities on the premises that would likely endanger their health, safety, and/or well-being. Moreover, Defendants breached their duty of care because they knew, or should have known, that adults working as sex traffickers were causing, by any means, minors, including Plaintiff, to be sexually exploited and trafficked at the Roosevelt Inn on a repeated basis.

97. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, should have reasonably anticipated that it was reasonably foreseeable from their knowledge and/or past experiences that persons on the premises of the

Roosevelt Inn, including Plaintiff, would suffer serious bodily harm as a result of being victimized by violent crimes perpetrated by third parties on the premises of the Roosevelt Inn.

98. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, failed or refused to take adequate precautions to protect persons on the premises of the Roosevelt Inn, including Plaintiff, from criminal and violent activities of others, despite a reasonable likelihood that person on the premises of the Roosevelt Inn, including Plaintiff, would be victimized by, or subjected to, such criminal and/or violent acts, which could cause such persons serious bodily injury. The negligence of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees consisted of the following:

- a. Failing to execute and/or implement the established security plan and/or execute and/or implement any established security plan;
- b. Failure to publish and/or post orders at the security posts providing protocols for employees to follow in circumstances involving commercial sexual activity and/or human sex trafficking;
- c. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of individuals lawfully on the premises;
- d. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning removal from the premises of individuals posing security threats;
- e. Failing to adequately control access to the premises;
- f. Failing to prevent entry of unauthorized individuals onto the premises;
- g. Failing to properly and adequately hire, train and provide ongoing training to employees including but not limited to ongoing training involving recognizing, preventing and responding to criminal activity, prostitution and sex trafficking;

- h. Failing to select and/or retain only personnel competent to provide proper and adequate professional services;
- i. Failing to assign experienced security personnel to provide competent guard services at the Roosevelt Inn;
- j. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of business invitees on the premises of the Roosevelt Inn;
- k. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper security measures in a motel setting;
- l. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper monitoring, surveillance, and patrolling of the premises;
- m. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning prevention of violent and/or criminal acts on the premises;
- n. Failing to detect and respond to commercial sex activity and human sex trafficking at the Roosevelt Inn;
- o. Failing to conduct adequate surveillance of the premises of the Roosevelt Inn;
- p. Failing to utilize surveillance equipment to monitor suspicious activity and promptly react thereto for the safety of Plaintiff;
- q. Failing to respond and react to suspicious activity detected on video surveillance;
- r. Failing to maintain surveillance equipment in proper working order;
- s. Failing to test or properly test surveillance equipment to ensure it was in working order;
- t. Failing to utilize appropriate and/or required surveillance equipment;
- u. Failing to adequately monitor activity on video surveillance and promptly react thereto for the safety of Plaintiff;
- v. Allowing individuals to come on to the premises for the express purpose of trafficking Plaintiff;

- w. Failing to prevent Plaintiff from being trafficked on the premises;
- x. Breaching its duties under the Restatement of the Law of Torts (Second), including but not limited to §§ 302, 318, 321, 323, 324A, and 344; and
- y. Failing to exercise care, caution and diligence required under the circumstances.

99. By renting rooms to Plaintiff's sex traffickers, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, breached the standard of good and prudent care by not reporting, intervening, disrupting or otherwise stopping the practice of traffickers committing commercial sex acts with a minor.

100. As a result of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel's negligence, Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradation, mental distress, loss of the enjoyments of life and loss of life's pleasures both in the past and in the future.

101. As a result of Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC, and Yagna Patel's negligence, Defendants breached its duty to Plaintiff in not reporting, intervening, disrupting or otherwise stopping sex trafficking occurring at the Roosevelt Inn.

102. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand

(\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT III – NEGLIGENCE

M.B. v. ALPHA-CENTURION SECURITY, INC.

103. The averments of paragraphs 1 through 102 are incorporated herein by reference.

104. Having undertaken responsibilities as aforesaid and the provision of security services at the Roosevelt Inn, Defendant Alpha-Centurion Security, Inc. owed a duty to protect the safety and well-being of individuals lawfully present at the motel, the motel's guests, the motel's employees, and the motel's property.

105. Defendant Alpha-Centurion Security, Inc. failed to report to authorities, intervene, disrupt or otherwise stop the human sex trafficking of the Plaintiff, although Defendant Alpha-Centurion Security, Inc. had knowledge of criminal activity, commercial sex activity and human trafficking occurring at the Roosevelt Inn.

106. Defendant Alpha-Centurion Security, Inc., by and through its agents, ostensible agents, officers, servants, and/or employees, was negligent by:

- a. Failing to execute and/or implement the established security plan and/or execute and/or implement any established security plan;
- b. Failure to publish and/or post orders at the security posts providing protocols for security personnel to follow in circumstances involving criminal activity, commercial sexual activity and/or human sex trafficking;
- c. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of individuals lawfully on the premises;
- d. Failing to adopt, establish, implement, and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning removal from the premises of individuals posing security threats;
- e. Failing to adequately control access to the premises;

- f. Failing to prevent entry of unauthorized individuals onto the premises;
- g. Failing to properly and adequately train and provide ongoing training to its security personnel including but not limited to ongoing training involving preventing and responding to commercial sexual activity and human sex trafficking;
- h. Failing to select and/or retain only personnel competent to provide proper and adequate security services;
- i. Failing to assign experienced security personnel to provide competent guard services at the Roosevelt Inn;
- j. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations and/or guidelines concerning protection of business invitees on the premises of the Roosevelt Inn;
- k. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper security measures in a hotel setting;
- l. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning proper monitoring, surveillance, and patrolling of the premises;
- m. Failing to adopt, establish, implement, execute and/or enforce required policies, procedures, rules, regulations, and/or guidelines concerning prevention of violent and/or criminal acts on the premises;
- n. Failing to detect and respond to commercial sex activity and human sex trafficking at the Roosevelt Inn;
- o. Failing to conduct adequate surveillance of the premises of the Roosevelt Inn;
- p. Failing to utilize surveillance equipment to monitor suspicious activity and promptly react thereto for the safety of Plaintiff;
- q. Failing to respond and react to suspicious activity detected on video surveillance;
- r. Failing to maintain surveillance equipment in proper working order;
- s. Failing to test or properly test surveillance equipment to ensure it was in working order;
- t. Failing to utilize appropriate and/or required surveillance equipment;

- u. Failing to adequately monitor activity on video surveillance and promptly react thereto for the safety of Plaintiff;
- v. Allowing individuals to come on to the premises for the express purpose of conducting commercial sex acts with Plaintiff;
- w. Failing to prevent Plaintiff from being trafficked on the premises; and
- x. Breaching its duties under the Restatement of the Law of Torts (Second), including but not limited to §§ 302, 318, 321, 323, 324A, and 344.

107. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Plaintiff was caused to suffer physical harm, a sexually transmitted disease, mental anguish, humiliation, exploitation, degradations, mental distress, loss of enjoyment of life and loss of life's pleasures both in the past and in the future.

108. As a result of Defendant Alpha-Centurion Security, Inc.'s negligence, Defendant Alpha-Centurion Security, Inc. breached its duty in not reporting, intervening, disrupting or otherwise stopping sex trafficking occurring at the Roosevelt Inn including harm to Plaintiff.

109. Each of the herein-described tortuous or otherwise culpable acts or omissions by Defendant Alpha-Centurion Security, Inc. increased the likelihood that Plaintiff would suffer the injuries set forth in this Complaint.

110. Defendant Alpha-Centurion Security, Inc.'s negligence increased the risk of harm to Plaintiff and was a substantial factor in causing and continuing the harm and damages suffered by Plaintiff.

111. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of

Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT IV – NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

**M.B. v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS
MANAGEMENT COMPANY, LLC, YAGNA PATEL**

112. The averments of paragraphs 1 through 111 are incorporated herein by reference.

113. Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, negligently committed the acts averred in this Complaint against the Plaintiff and thereby caused Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Plaintiff.

114. Defendants acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT V– NEGLIGENT INFLICTION OF EMOTIONAL DISTRESS

M.B. v. ALPHA-CENTURION SECURITY, INC.

115. The averments of paragraphs 1 through 114 are incorporated herein by reference.

116. Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, negligently committed the acts averred in this

Complaint against the Plaintiff and thereby caused Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress, directly and proximately causing harm and damages to the Plaintiff.

117. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

COUNT VI – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

**M.B. v. ROOSEVELT INN LLC, ROOSEVELT MOTOR INN, INC., UFVS
MANAGEMENT COMPANY, LLC, YAGNA PATEL**

118. The averments of paragraphs 1 through 117 are incorporated herein by reference.

119. By knowingly renting rooms to Plaintiff's sex traffickers, Defendants Roosevelt Inn LLC, Roosevelt Motor Inn, Inc., UFVS Management Company, LLC and Yagna Patel, individually and/or by and through their actual or apparent agents, servants and employees, intentionally caused Plaintiff to suffer fear, depression, humiliation, mental anguish and severe physical and emotional distress and proximately causing harm and damage to the Plaintiff.

120. Defendants acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against all Defendants and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment

delay.

COUNT VII – INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS

M.B. v. ALPHA-CENTURION SECURITY, INC.

121. The averments of paragraphs 1 through 120 are incorporated herein by reference.

122. By failing to report, intervene, disrupt or otherwise stop the trafficking of Plaintiff M.B., Defendant Alpha-Centurion Security, Inc., individually and/or by and through its actual or apparent agents, servants and employees, intentionally caused Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Plaintiff.

123. By having knowledge of commercial sex activity and failing to intervene, Defendant Alpha-Centurion Security, Inc. intentionally caused Plaintiff to suffer fear, depression, humiliation, mental anguish and sever physical and emotional distress and proximately causing harm and damage to the Plaintiff.

124. Defendant Alpha-Centurion Security, Inc. acted outrageously and in reckless disregard for the health and welfare of the Plaintiff warranting the imposition of punitive damages.

WHEREFORE, Plaintiff M.B. demands judgment in her favor and against Defendant Alpha-Centurion Security, Inc. and demands compensatory and punitive damages in excess of Fifty Thousand (\$50,000.00) Dollars exclusive of prejudgment interest, costs and damages for pre-judgment delay.

KLINE & SPECTER, P.C.

BY: _____
THOMAS R. KLINE, ESQUIRE
NADEEM A. BEZAR, ESQUIRE
EMILY B. MARKS, ESQUIRE

EXHIBIT C

**MARSHALL DENNEHEY
WARNER COLEMAN & GOGGIN**

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NEW JERSEY	NEW YORK
Mount Laurel	Long Island
Roseland	New York City
DELAWARE	Westchester
Wilmington	

July 13, 2018

VIA: E-MAIL - Nadeem.Bezar@KlineSpecter.com;

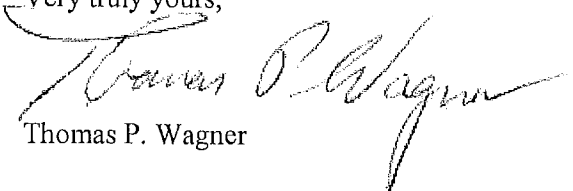
Nadeem A. Bezar, Esquire
Kline & Specter, PC
1525 Locust Street, 19th Floor
Philadelphia, PA 19102

**RE: M.B., et al. v. Alpha-Centurion Security, Inc., et al.
Docket No.: PCCP; March Term, 2017; No. 00712
Our File No.: 02983.00316**

Dear Nadeem:

Please be aware that defendant Alpha-Centurion, Inc. will stipulate to the filing of your proposed Second Amended Complaint.

Very truly yours,


Thomas P. Wagner

TPW/mmk

cc: Emily Marks, Esquire (via: e-mail - Emily.Marks@KlineSpecter.com)
Grant S. Palmer, Esq./James J. Quinlan, Esq.
(via: e-mail - palmer@blankrome.com/Quinlan@BlankRome.com)